

IN THE MATTER OF AN APPLICATION TO  
AN BORD PLEANÁLA

FOR APPROVAL OF (I) THE N6 GALWAY CITY RING ROAD  
PURSUANT TO SECTION 51 OF THE ROADS ACT 1993 (AS  
AMENDED); (II) THE N6 GALWAY CITY RING ROAD  
MOTORWAY SCHEME 2018; and (III) THE N6 GALWAY CITY  
RING ROAD PROTECTED ROAD SCHEME 2018

ABP Ref. ABP-302848-18 and ABP-302885-18

ORAL HEARING

STATEMENT of Evidence

Responses to Planning & Policy Context

Objections/Submissions

by

**John O' Malley – Kieran O' Malley & Co. Ltd.**

assisted by

**Pauline Byrne - Brady Shipman Martin,**

**Valerie Loughnane - Galway County Senior Planner,**

**Brendan Dunne - Galway County Planner**

**Caroline Phelan - Galway City Senior Planner,**

**& Uinsinn Finn Galway City Senior Transport Engineer**

**18 February 2020**



# 1 Qualifications and Experience

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## 1.1 John O' Malley

- 1.1.1 I am a Chartered Town Planner with more than 25 years of private planning practice experience advising private and public sector clients in Ireland.
- 1.1.2 I hold an undergraduate degree in Civil Engineering from Trinity College Dublin and a Masters in Regional and Urban Planning from University College Dublin. I am a member of the Irish Planning Institute and the Royal Town Planning Institute.
- 1.1.3 I am a Director in the firm of Kieran O'Malley and Company Limited, Town Planning Consultants, of Saint Heliers, Saint Heliers Copse Blackrock, Co. Dublin. My consultancy experience includes advising clients in relation to a wide range of successful residential, commercial, industrial and leisure developments. The core work entails the provision of professional services and advice to assist clients and their agents in the preparation of planning applications and appeals and in relation to enforcement, site feasibility studies, compensation and exempted development.
- 1.1.4 I have been project manager and led a multi-disciplinary professional team on a number of large infrastructure projects. In this capacity, I have represented clients at pre-application consultations and oral hearings before An Bord Pleanála. I have acted for land owners at public enquiries in respect of infrastructural works such as roads, light rail, rail and public utilities. I have given sworn evidence before the Property Arbitrator and provided expert witness testimony in the Courts.

## 1.2 Pauline Byrne

- 1.2.1 Pauline is a regional and urban planner with over 20 years' experience in planning in Ireland and internationally. She has a Masters in Regional and Urban Planning (MRUP) from University College Dublin, and a B.Sc. (Mgmt) from Trinity College Dublin.
- 1.2.2 Pauline is a partner at Brady Shipman Martin and head of the planning team in the practice. She has worked on urban planning strategies, planning policy, major city development initiatives, large scale infrastructure projects, public transport initiatives, industrial development initiatives, and arbitration cases, on behalf of Government departments and agencies, local authorities, State bodies and State companies, including NTA, OPW, ESB, Bord Na Mona, and the private sector. She has previously inputted to environmental impact assessments in relation to Strategic Planning Policy Context on bus network planning in Dublin for the NTA.

### **1.3 Valerie Loughnane**

- 1.3.1 Valerie is a Senior Planner with Galway County Council, with some twenty years of professional town planning experience. She has a Bachelor of Arts (Hons) Degree from NUI Galway in Mathematics and Geography, Master's Degree in Regional and Urban Planning (MRUP) from University College Dublin and she holds a Higher Diploma in Education from NUI Galway.
- 1.3.2 Valerie is a Senior Planner in Galway County Council since August 2015 having worked with Galway County Council since 1999. Her experience is wide and varied and includes planning policy formulation at both Regional and County level and extensive experience in a Development Management role with the Council.

### **1.4 Brendan Dunne**

- 1.4.1 Brendan Dunne is an Executive Planner, with approximately 15 years of professional town planning experience in the North of Ireland, Westmeath County Council, Wicklow County Council and in his current role with Galway County Council. He has a Bachelor of Arts Degree from NUI Galway in Geography Sociology and Politics, a Masters in Town and Country Planning from Queens University Belfast and a Postgraduate Diploma in Environmental Engineering from Trinity College Dublin.
- 1.4.2 Brendan is an Executive Planner in the Forward Planning Policy Section of Galway County Council. He worked previously in development management in the local authorities listed above. He worked previously on the preparation of a number of county development plans/local area plans and has also prepared submissions on a number of national policy documents.

### **1.5 Caroline Phelan**

- 1.5.1 Caroline Phelan is a Senior Planner with in excess of 20 years' experience working in planning in the public sector for a number of local authorities in both an urban and rural context. She has a Masters in Regional and Urban Planning (MRUP) and a B. Soc. Science from University College Dublin, and a Dip. In Archaeology from NUI Galway.
- 1.5.2 Caroline's planning experience has encompassed all areas of planning including strategic policy, development management and plan implementation. Her predominant career experience has been with Galway City Council and has included presiding over the preparation of the last three City Development Plans.

## 1.6 Uinsinn Finn

- 1.6.1 Uinsinn is a Senior Engineer and Head of Transport at Galway City Council. Prior to that he served with Clare, Offaly and Galway County Council's. He also previously worked for 8 years with Balfour Beatty and WSP in the UK on projects including the Jubilee Line Underground Extension, Motorway Projects including the Leeds M1/A1 Link and the Millennium Dome Project. Uinsinn has over 25 years professional experience in civil engineering and is a Chartered Engineer with an MBA from DCU.
- 1.6.2 Of Uinsinn's 25 years professional experience, he has worked for the past 18 years in local authorities, with over 16 of these in the Transport and Infrastructure Directorship. He has been involved in the project management of various schemes from Road Maintenance and Improvements to Flood Protection. In his current role as Head of Transport, he is leading a team for the implementation of policy objectives and transport projects under the GTS including the BusConnects Galway: Cross City Link.

## 2 Role in Proposed Road Development

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- 2.1 John O'Malley's role in the N6 Galway City Ring Road Project ("GCRR") is to provide an assessment of the proposed road development in the national, regional and local planning context and the relevant policy context.
- 2.2 Pauline Byrne's role has involved the assessment of the proposed road development in the national and regional planning and policy context.
- 2.3 Valerie Loughnane's role has involved the assessment of the proposed road development in the local planning and policy context with respect to the Galway County Development Plan.
- 2.4 Brendan Dunne's role has involved the assessment of the proposed road development in the local planning and policy context with respect to the Galway County Development Plan.
- 2.5 Caroline Phelan's role has involved the assessment of the proposed road development in the local planning and policy context with respect to the Galway City Development Plan.
- 2.6 Uinsinn Finn is the senior transport engineer and responsible for the implementation and successful delivery of the Galway Transport Strategy, of which the proposed N6 GCRR is a key element.

## 3 Key issues in relation to Planning & Policy Context

### *Overview*

- 3.1 This statement of evidence sets out the key planning and policy context within which this application is to be evaluated by the Board and addresses issues pertaining to planning policy raised in the submissions and objections received by An Bord Pleanála.
- 3.2 The rationale for the proposed road development is set out at Chapter 3 of the EIAR. The proposed N6 GCRR is part of a 20 year transport strategy for Galway City and the wider city environs. The N6 GCRR has two key functions. It provides for the strategic need of the national road network and connectivity of Galway City and the West Region to the national road network. It relieves the city centre road network of strategic traffic and provides the necessary road space for the successful delivery of other transport modes, namely, walking, cycling and public transport.
- 3.3 The analysis at Chapter 2 of the EIAR demonstrates that the N6 GCRR is consistent with all relevant transportation and strategic planning policies set out in the relevant policy documents at European, national, regional and local levels. To assist the Board and for the convenience of all participants at this oral hearing and to place the responses to objections and submissions that follow in context, the main planning policy and guidance provisions are briefly summarised below.

### *Infrastructure - TEN-T – Connecting Europe*

- 3.4 N6 GCRR is part of European Union TEN-T comprehensive road network and will enhance the accessibility of the Western Region and Galway City.

### *Project Ireland 2040: Building Ireland's Future*

- 3.5 The N6 GCRR is a key future growth enabler in the NPF and will improve the road network and enhance regional accessibility.
- 3.6 The Planning Framework is underpinned by a 10-year capital investment of €116bn in the National Development Plan (NDP) to deliver major infrastructure projects including the N6 GCRR, which is in National Roads Programme 2018-2027.

### *Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly [made on January 24<sup>th</sup> 2020]*

- 3.7 Regional Policy Objectives 3.6.7 and 6.6 of the RSES support the delivery of the N6 GCRR.
- 3.8 The N6 GCRR is a key part of the Galway Metropolitan Area Strategic Plan (MASP) and is a “transport investment priority” at Section 6.3 of the RSES.

### *Galway Transport Strategy 2016-2035*

- 3.9 The Galway Transport Strategy (GTS) sets out the means to achieve the vision for transport in Galway of “a connected city region driven by smarter mobility”.

3.10 The N6 GCRR is a key component of the GTS to ensure the delivery of the full transport strategy for Galway which aims to reduce dependency on private cars and bring about significant modal shift to public transport and active modes.

3.11 The N6 GCRR will facilitate traffic movement around the city centre, reduce congestion and free up road space for bus priority, improved public transport network and services and cycling and walking.

#### ***Galway City Development Plan 2017-2023***

3.12 The N6 GCRR and its associated land requirements are prioritised as per Section 11.2 of the Galway City Development Plan 2017-2023. Aligning land use with investment in sustainable transport is a focus of the Core Strategy, which is supported and informed by the GTS and the N6 Galway City Ring Road project.

3.13 Policy 3.2 is to *“facilitate the future development of Galway City and environs within the strategic framework of the Galway Transport Strategy (GTS) and associated implementation phasing to ensure that the city has the necessary transport infrastructure and services to support its continued growth and development.”*

3.14 Policy 3.3 is *“to progress a sustainable transport solution for the city through the implementation of measures included in the GTS and required supporting projects in particular the N6 GCRR project”*.

#### ***Ardaun LAP 2018-2024***

3.15 Strategic Goal 4 of the Ardaun Local Area Plan 2018-2024 is to facilitate the development of a well-connected, walkable, accessible urban village at Ardaun. This goal is supported by a policy to promote interconnectivity between all modes to link Ardaun to the main hubs for activity in accordance with the GTS. The N6 GCRR a key component of the GTS and is indicated on the LAP map,

#### ***Galway County Council Development Plan 2015-2021***

3.16 The Galway County Development Plan 2015-2021 focuses on Galway City as a Gateway for the county. The GTS which includes the N6 GCRR is critical to the proper planning and sustainable development of the entire county and the delivery of the Core Strategy because the proposed road development enhances connectivity within the county and in the wider region.

3.17 Table 5.1 of the Written Statement of the County Development Plan identifies the N6 GCRR as priority transportation infrastructure 2015-2021 to be provided in the current development plan.

3.18 Section 5.3.4.5 of the County Development Plan states that the *“additional capacity provided by an orbital route will increase the opportunities for re-allocation existing road space for use by pedestrians, buses and cyclists. In this regard the orbital route identified as the N6 GCRR project ... is considered to be a critical part of the Transport Strategy for the county to deliver the necessary capacity and support the delivery of sustainable transport measures.”*

## 4 Responses to Submissions/Objections

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### 4.1 Overview

4.1.1 45 of the 296 submissions/objections made to An Bórd Pleanála (ABP) in respect of the N6 Galway City Ring Road (GCRR) Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS), Motorway Scheme (MS) and Protected Road Scheme (PRS) include observations relevant to planning and policy context. Two of the 17 submissions received in relation to the Request for Further Information Response related to planning and policies. The issues raised are:

- Compliance with Planning and Development Legislation and Legal Authorities (4.2)
- National and Regional Policies (4.3)
- Galway City and County Development Plan Objectives (4.4)
- Sustainable Development (4.5)

4.1.2 Caroline Phelan prepared the response to the matters raised in the submissions/objections on the policies and objectives in the Galway City Development Plan 2017-2023 and will present Section 4.4 to the hearing.

4.1.3 Valerie Loughnane and Brendan Dunne jointly prepared the response in respect of the equivalent provisions of the Galway County Development Plan 2015-2021 as set out in the submissions/objections and will present Section 4.5 to the hearing.

### 4.2 Compliance with Planning and Development Legislation and Legal Authorities

#### Issues

4.2.1 10 submissions/objections relate to the compliance with planning and development legislation and legal authorities as follows:

- The proposed road development is not in accordance with planning and environmental legislative procedures: Ob\_145.1; Ob\_145.2; Ob\_145.3 Ob\_511.06; Ob\_528\_541\_543\_557; Ob\_534; Ob\_695; S\_049 and S\_058
- One or more of the following case laws, Case C-258/11; Case C-164/17; and Case C-461/17 were raised: S\_058, Ob\_602\_698\_699\_704 and Ob\_695
- The timing of the finalisation of the GTS being subsequent to the selection of the Emerging Preferred Route Corridor for the proposed road development suggests a flawed procedure: Ob\_534 and S\_049
- Environmental and Planning matters were noted but undefined: Ob\_145.1; Ob\_145.2; Ob\_145.3, Ob\_534, and Ob\_695

## Responses

### *Planning and environmental legislative procedures*

- 4.2.2 Assertions have been made in a number of the submissions/objections that the proposed road development has not been developed in accordance with planning and environmental legislative procedures. It has been specifically alleged that the *EIAR focuses on the transportation policy context but is deficient in that it fails to set out the comprehensive national, regional and local policies pertaining to education and NUIG, in particular (Ob\_528\_541\_543\_557)*.
- 4.2.3 As outlined at Chapter 1, Introduction, the EIAR has been prepared in accordance with the relevant provisions of Directive 2011/92/EU on the Assessment of the Effects of Certain Public and Private Projects on the Environment, as amended by Directive 2014/52/EU. In addition, the EIAR contains the information prescribed by the relevant provisions of the Roads Act, 1993 as amended, the Roads Regulations, 1994 as amended, Article 5 and Annex IV of Directive 2011/92/EU as amended.
- 4.2.4 Moreover, a Natura Impact Statement (NIS) has been prepared in accordance with the provisions of Part XAB of the Planning and Development Act, 2000 (as amended) and in accordance with the requirements of Council Directive 92/41/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive). The NIS was submitted to ABP to enable it to undertake an Appropriate Assessment of the proposed road development in accordance with the Habitats Directive.
- 4.2.5 A Protected Road Scheme and a Motorway Scheme were also submitted for approval to ABP under Section 49 of the Roads Act 1993, as amended.
- 4.2.6 Accordingly, the relevant planning and environmental legislative procedures have been followed in relation to this application.

### *Legal matters*

- 4.2.7 It is asserted in submission/objection S\_058 that it is not possible to grant permission for this development having regard to the decisions of the Court of Justice of the European Union (CJEU) in Case C-258/11 *Sweetman v An Bord Pleanála*, Case C-164/17 *Grace and Sweetman v An Bord Pleanála* and Case C-461/17 *Holohan v An Bord Pleanála*. These issues are dealt with in the legal submission to be delivered on behalf of Galway County Council.
- 4.2.8 Ob\_511.06 makes reference to the 1982 County Borough Development Plan and that the access road in the Heath was developed solely to provide access to individual dwellings within the Heath as per that 1982 Plan, and that any intensification of its use would be in breach of its “authorised approval”. The proposed acquisition of the access road in the Heath is in accordance with the provisions of the Roads Act 1993 (as amended) and is necessary for or incidental to the construction or maintenance of the N6 GCRR, which is identified in both the Galway County Development Plan and Galway City Council Development Plan.

### *Timing of the Galway Transport Strategy*

- 4.2.9 It has been suggested that the timing of the finalisation of the GTS – i.e. subsequent to the selection of the Emerging Preferred Route Corridor for the proposed road development – represents a flawed procedure (Ob\_534 and S\_049).
- 4.2.10 In response, the Galway Transport Strategy (GTS) (2016) builds on previous transport studies carried out for the Galway Region. The transport strategy for Galway City evolved from the Galway Transportation and Planning Study, 2002 (GTPS), which set out a strategy for transportation and settlement for the city and its environs. The project was run jointly by Galway City and County Councils and was adopted by both in 2003. This strategy supported significant improved public transportation systems including development of the bus network, park and ride facilities, commuter rail services and improvements to cycling and walking networks in conjunction with the development of the Galway City Outer Bypass (2006). The Galway Transportation Unit within Galway City Council was established in 2008 with a focus on developing such an integrated transport solution for the city, to promote the increased use of non-car-based transport services based on smarter travel principles and to overcome existing congestion.
- 4.2.11 This proposal for the N6 Galway City Ring Road was developed from a study commissioned to re-examine the N6 Galway City Outer Bypass, 2006. At the outset of this re-examination an assessment of overall transport demand was undertaken to understand the transport problem. This assessment needed to consider whether alternatives to major new road construction existed in the context of sustainable transport policy. A key conclusion of this initial assessment was that bypass traffic is not the major component of the transport problem in Galway. It was clear that any improvement to the national road network, if required, must be developed within an overall transport strategy that considered all modes.
- 4.2.12 Consequently, a separate team was commissioned to develop an overall transport strategy for Galway. This work was led by Galway City Council, in conjunction with Galway County Council and the NTA, and culminated in the publication of the Galway Transport Strategy (GTS).
- 4.2.13 It was necessary for the work on the N6 GCRR to continue in parallel to inform the GTS on the feasibility and location of a new road crossing of the River Corrib and how this could be connected to the existing road network. As work on the GTS proceeded the N6 GCRR team focused on possible options for a new crossing of the River Corrib. In this way the two studies informed each other.
- 4.2.14 Thus, the N6 GCRR is the road component of the overall transport solution and the road is necessary to address the congestion problems restricting the maximum implementation of the Smarter Travel policies. This is further set out in Section 1.3 of Chapter 1 of the EIAR.
- 4.2.15 Section 2.5 of the Galway Transport Strategy 2016-2035 (GTS) lists the policy context including previous transport studies carried out for Galway and confirms that the GTS takes into account and seeks to achieve objectives in Smarter Travel, A Sustainable Transport Future, A New Transport Policy for Ireland 2009-2020

[Department of Transport Tourism and Sport (2009)]. The GTS sets out an overview of the proposed actions and measures for implementation, covering infrastructural, operational and policy elements combined under an overall vision “to create a connected city region driven by smarter mobility”. The transport strategy underpins the Galway City and Galway County Development Plans.

- 4.2.16 As part of the formulation of the GTS, an identification of solutions to the transport issues facing Galway City and its environs was undertaken involving two public consultations, followed by the examination of the effectiveness of an incremental introduction of measures in addressing the city’s transport issues before new road infrastructure was considered. The modelling confirmed that the implementation of a solution using only the existing road network and enhanced sustainable modes, namely walking, cycling and public transport, is insufficient in relieving traffic congestion, as per the assessment undertaken to inform the GTS. In fact, in the absence of the ring road, the combination of other measures would actually exacerbate congestion. The options considered for an orbital route for new road infrastructure factored in enabling of opportunities for sustainable transport modes and the maximisation the use of such modes.

***Environmental and Planning matters were noted but undefined***

- 4.2.17 As is explained at paragraphs 4.2.2 to 4.2.6 above the planning and environmental legislative procedures have been followed in relation to this application.

## **4.3 National and Regional Policies**

### **Issues raised in submissions**

- 4.3.1 The following issues relating to national and regional policy have been raised in the submissions:
- The proposed road development is contrary to the National Planning Framework (NPF): Ob\_049, Ob\_511.06; S\_012; Ob\_528\_541\_543\_557
  - A road project has been prioritised above regional planning: Ob\_511.06
  - The location of the proposed road development will encourage urban sprawl: Ob\_136; S\_042

### **Responses**

#### ***National Planning Framework (NPF)***

- 4.3.2 Chapter 2 in the EIAR confirms the proposed road development is consistent with current policies and objectives in relation to land use and transport planning, balanced regional and sustainable development at European, national, regional and local levels.
- 4.3.3 In response to the specific assertion that the proposed road development is contrary to the National Planning Framework (NPF), it should be noted the National

Development Plan 2018-2027 (NDP) with the NPF, forms part of the *Project Ireland 2040: Building Ireland's Future*, which seeks the delivery of major national infrastructure projects in the interest of, inter alia, enhanced regional accessibility, one of the National Strategic Outcomes in the Planning Framework. The N6 GCRR is identified as one such project at Sections 1.7 and 5.2 of the NDP and will enhance connectivity to and within the Region.

- 4.3.4 Section 2.3.4 of Chapter 2 of the EIAR examines the proposed road development with respect to the ten National Strategic Outcomes of the NPF and demonstrates that the N6 GCRR is necessary to deliver those outcomes in the Western Region [see Table 1 in Appendix A attached herewith].
- 4.3.5 The NPF recognises that a “business as usual approach” replicating the pattern of extensive low density suburban housing is not sustainable. The NPF promotes sustainable development founded upon a compact city model with increased residential density accompanied by enhanced public transportation and proper provision for cycling and walking. The NPF expressly identifies the proposed road development as a key future growth enabler for Galway City and the Western Region.
- 4.3.6 The proposed N6 GCRR provides capacity for trips around the city and in doing so, reduces trips through the city centre. Less trips on city centre roads means less congestion so road space within the city centre will be re-allocated to more sustainable modes of public transport, cycling and walking increasing their modal share.
- 4.3.7 Thus, the proposed N6 GCRR both directly and indirectly enables the achievement of important sustainable development objectives, including the national strategic outcomes in the NDP and NPF.
- 4.3.8 Section 2 of the NPF, “A New Way Forward”, sets out the overall strategy for the accommodation of the projected population and economic growth in urban areas. Galway is identified as a regional driver for the Northern and Western Region at Section 3.3 of the NPF with “*key future growth enablers set out for Galway:*”
- *improving sustainable transport links*
  - *provision of a Citywide public transport network*
  - *development of a strategic cycleway network*
  - *delivery of the Galway City Ring Road”*
- 4.3.9 Accordingly, the NPF expressly states that the delivery of the N6 GCRR is a “key future growth enabler”, from which it follows that the proposed road development is consistent with and supported by the NPF.

### ***Regional Planning***

- 4.3.10 In reply to the contention that the proposed road development is “prioritised above regional planning”, a core principle of the NPF is to build stronger regions with greater accessibility within the regions and between the regional centres (National Policy Objective 2a). Limerick, Galway and Waterford are targeted for proportionately higher growth to become stronger accessible regional centres of scale and to improve their profile within the region as well as nationally and internationally.
- 4.3.11 Of the projected 1,000,000 national population growth to 2040, the NPF targets 160,000 to 180,000 persons in the Northern and Western Region of which Galway City and Suburbs (Galway Metropolitan Area) is to accommodate 40,000 to 45,000 persons.
- 4.3.12 Section 2.4 of Chapter 2, Planning and Policy, of the EIAR sets out the regional policy heretofore i.e. Section 2.4.1 Regional Planning Guidelines (RPGs) for the West Region 2010-2022, which are superseded by the making of the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region. The vision of the RSES is ‘to play a leading role in the transformation of this region into a vibrant, connected, natural, inclusive and smart place to work and live.’
- 4.3.13 The Regional Spatial and Economic Strategy for the Northern and Western Region includes a Metropolitan Area Strategic Plan (MASP) for the Galway Metropolitan Area (GMA). The MASP is a 12-year strategic framework plan founded upon the effective integration of land use and transport planning. The N6 GCRR is listed as a key transportation component of the MASP. Regional Policy Objective (RPO) 3.6.7 expresses support for the *Galway City Ring Road (S) and the Galway Transport Strategy (S/M/L)*.
- 4.3.14 Transport investment priorities for the West Region are set out at Section 6.3, which states that the major transport infrastructure investments have an important role in enabling the sustainable and balanced development of the region. The proposed road development is also subject to RSES Regional Policy Objective 6.6 and identified as a “Transport Investment Priority” for the Northern and Western Region at Section 6.3 of the RSES. Section 6.3.2 specifically addresses the road network and highlights the importance of improving regional accessibility to/from/within the Region as per the NPF and NDP. The N6 GCRR responds to this need for improved regional connectivity, it improves the county road network thereby reducing transport costs and contributes to the future economic development of the region.
- 4.3.15 Section 6.2 of the RSES notes the challenges to the provision of transport in the Region and reiterates the importance of *“the close integration of transport spatial and economic planning provides the opportunity to deliver improved sustainable transport options for people and reduce dependency on the private car.”* The extract below from this section endorses the GTS in this regard.

*“A best practice example of where the integration of transport, spatial and economic planning is to be delivered, is the Galway Transportation Strategy*

*(GTS). The GTS should be used as a template elsewhere and initially, a similar approach should be adopted as a priority in Sligo, Athlone and Letterkenny (incorporating an overall cross-border Transport Assessment (multi-modal) with Derry)."*

4.3.16 As noted earlier, the GTS was prepared by Galway City Council and Galway County Council, in partnership with the NTA. The GTS is based on a comprehensive assessment of the transport issues facing Galway City and its environs and the need to develop a sustainable integrated transport solution to accommodate travel demand so as to facilitate growth *"in an integrated, sustainable manner that aligns transport investment with settlement patterns, travel movements and also supports a sustainable use of land."*

4.3.17 The main components of the GTS are:

- changes to the traffic network, including a new cross-city link public transport corridor, and the N6 GCRR, and the targeted re-allocation of road space in the city to prioritise walking, cycling and public transport
- improved local public transport network and regional public transport service focused on an enhanced, integrated high quality bus service
- the Bearna Greenway, the Galway City to Oranmore cycleway (part of Galway to Dublin cycleway) and the Galway to Oughterard Greenway
- additional cycling, pedestrian and public realm improvements including more options for cycling within and across the city centre, improved pedestrian facilities, pedestrian prioritisation, way finding and legibility
- complementary measures including education and behavioural change measures and continued investment in Intelligent Transport Solutions (ITS) to increase efficiency, safety and co-ordination across transport networks (Smarter Mobility), and further emphasis on land use and transport integration

4.3.18 The proposed road development is therefore a key element of the transport strategy to provide for the existing and future transport requirements of Galway City and its environs. It provides an additional crossing of the River Corrib, thus facilitating a reduction in congestion on city centre roads and enables the re-allocation of road space within the city to non-private car modes of transport, thereby improving the attractiveness of non-car transport modes in the city for short and medium trips. Section 3.6 of the GTS Executive Report expressly refers to the contribution of the proposed road development in terms of achieving the overall objectives of the transport strategy.

*"Given the strong negative impact of congestion on achieving the objectives of this strategy, unless additional capacity is provided for traffic, the overall objectives for the Transport Strategy will not be met. Furthermore, this additional road capacity should not be in conflict with the enhanced sustainable transport network, rather it should focus on supporting trips that cannot be facilitated by*

*the proposed measures (i.e. outer-city movements and external-to-external trips). A new road link to the north of the city is therefore proposed as part of this Transport Strategy to deliver the necessary capacity and support the delivery of sustainable transport measures.”*

- 4.3.19 The Strategy developed envisages improvements to the road network, prioritising sustainable bus transport through major network redesign and service provision, the development of a cycling network and improved walking facilities supported by other measures such as integrated ticketing, real time information, encouraging behavioural change and better land use transportation co-ordination in the statutory development plans. The GTS is currently being implemented by Galway City Council, both in terms of the policy objectives established and the delivery of transport projects identified within the strategy.
- 4.3.20 The N6 GCRR is one of a suite of proposals in the transport strategy for Galway. Nonetheless, the proposed road development is key component of the GTS to ensure the delivery of the maximum benefits of the full transport strategy for Galway which is designed to reduce dependency on private cars and to bring about modal shift to public transport and active modes. The implementation of the GTS measures including the proposed road development is necessary for the proper planning and sustainable development of the Galway Metropolitan Area as articulated in the statutory development plans for the City and the County and to deliver the strategic outcomes in Project Ireland 2040.
- 4.3.21 The proposed road development therefore fully aligns with sustainable regional development policy and seeks to deliver on these objectives, and cannot reasonably be considered as being prioritised above regional planning.
- The location of the proposed road development will encourage urban sprawl***
- 4.3.22 The N6 GCRR supports sustainable growth in Galway and aligns with the compact urban growth model in national planning policy, which is specifically intended to avoid further urban sprawl. This is considered in relation to compliance with national, regional and local policies on sustainable development at Section 4.5.

## 4.4 Galway City Development Plan 2017-2023 Objectives

### Issues

4.4.1 The following issues have been raised in relation to certain policies and objectives of the Galway City and County Development Plans:

- (a) The proposed road development does not achieve the objectives of the Galway City and County Development Plans with respect to employment and gateway due to its potential impact on lands zoned for employment at Ballybrit by the proposed Parkmore Link Road: Ob\_695
- (b) It is proposed to use Lackagh Quarry for a construction compound which differs from the current zoning of this land: Ob\_584.1
- (c) Focus on transportation policies and inadequate consideration of the education policies and objectives in the City Plan: Ob\_528\_541\_543\_557
- (d) Impacts to NUIG lands which are zoned recreational and loss of amenity: Ob\_528\_541\_543\_557; Ob\_511.06 and S\_024
- (e) Policy 2.5 for Outer Suburbs of the city and proper planning and sustainable development: S\_011; S\_031
- (f) Ardaun – issue of connectivity within the LAP, and delivery of sustainable transport options for Ardaun lands: S\_009
- (g) No information regarding the standard set back for development access on the feeder roads to this roadway: Ob\_213

### Responses

#### **Galway City Development Plan 2017-2023**

##### ***(a) Galway City Development Plan (2017-2023) Employment & Gateway Objectives***

4.4.2 The Galway City Development Plan, as referenced at Section 2.5.2.1 (pgs. 59 & 60) of the EIAR, prioritises the delivery of its Core Strategy and its Strategic Goals, and the key elements pertaining to its achievement, including to “enable the City to fulfil its role as a National Gateway, a Regional Centre and contribute to the economic recovery through the provision of balanced and sustainable economic opportunities for growth, innovation and investment across all employment sectors and allow the role of the Gateway to harness the strengths and maximise the economic development for the whole West Region”. The GTS of which the N6 GCRR is a vital component and is necessary for the full delivery of the transport strategy is integrated throughout the policies and provisions in the Galway City Development Plan [refer to Section 2.5.2.1 of Chapter 2 of the EIAR]. The achievement of economic objectives at a city and county scale is central to the proposed road development and Galway City’s status as one of the five regional cities in the National Planning Framework.

4.4.3 The N6 GCRR complies with the Galway City Development Plan. Specifically, Chapter 3 of the Galway City Development Plan identifies the N6 GCRR as a main priority of the overall transport strategy for the city as the following extract from Section 3.10 confirms.

*“Support the N6 GCRR project in conjunction with Galway County Council and Transport Infrastructure Ireland in order to develop a transportation solution to address the existing congestion on the road network and reduce the negative impact of vehicular traffic on the functioning and experience of the city centre and to facilitate city bound, cross –city, cross- county and strategic east – west movements.”*

4.4.4 Section 11.2 of the City Plan states that *“priority will be given to the reservation of the N6 GCRR Preferred Route Corridor and the associated land requirements over other land use zonings and specific objectives”*. The reservation of the proposed N6 GCRR therefore takes precedence over other use zonings in the following areas:

- The Galway City Development Plan envisages and provides for planned further employment growth in the Ballybrit/Parkmore area with the provision of bus corridors and the core cycle network to serve the associated transport needs of existing and future enterprises in the area. The Parkmore Link Road, a key component of the proposed road development, directly connects Ballybrit and Parkmore with public transport, a footpath and cycle network, thereby enhancing access to employment opportunities without the need to use a private car on the national road network.
- The proposed road development is delivering a significant improvement in the road network and will enable the more efficient movements of goods and vehicles to/from the city, around the city and in the wider region.
- It is acknowledged there will be an impact on some industrial zoned lands at Ballybrit, however, any reduction in the quantum of zoned employment lands is balanced by the benefits derived from the N6 GCRR in the area through significantly improved access to the national road network and the local road network. These improvements are acknowledged in a number of the submissions. Access and mobility improvements delivered through the proposed road development together with the implementation of the other components of the overall transport strategy for Galway will reduce traffic congestion and enhance accessibility within and around the city. These measures will address existing transport problems, which are adversely affecting the development of lands throughout the city limiting the potential of Galway to achieve true regional city status as anticipated in the NPF and RSES.
- It is anticipated that the development of a strategic ring road, reliable high quality public transport system and the provision of walking and cycling opportunities will enable the sustainable development of appropriately zoned lands within the city and not exclusively at Ballybrit. The transport measures

including this proposed road development will help reinforce Galway's role as a major regional gateway and one of the five cities targeted for significant employment and population growth in the NPF. Economic development is being facilitated throughout the city as per recent grants of permissions for major employment development in the City Centre at Mervue and at Doughiska – all of which are being facilitated by and will support the enabling transport infrastructure in the GTS and the N6 GCRR.

4.4.5 The proposed road development is consistent with and necessary to achieve key objectives at Chapter 5 of the Galway City Development Plan in relation to the economy of the city including as follows.

- Support and facilitate the sustainable development of Galway as a Gateway for the West Region
- Enhance the economic performance of Galway as a Gateway and regional growth centre by addressing the identified current transportation problems in addition to providing for the future transportation requirements through the delivery of the transport components of the GTS and the N6 GCRR

***(b) Use of Lackagh Quarry as a construction compound***

- Lackagh Quarry is zoned 'A' on the land use zoning map in the Galway City Development Plan where the zoning objective is to provide for the development of agriculture and to protect rural character. Section 11.2 of the City Plan prioritises "*the reservation of the N6 GCRR Preferred Route Corridor and the associated land requirements over other land use zonings and specific objectives*". The corridor for the proposed N6 GCRR is indicated on the zoning map at Lackagh Quarry. The use of Lackagh Quarry as a construction compound is indicated in the lodged plans and particulars and is acceptable in the A zoning objective having regard to the provisions of Section 11.2 in relation to the proposed road development. Accordingly, the proposed N6 GCRR and the ancillary works at Lackagh Quarry does not contravene the zoning objective at the quarry.

***(c) & (d) Consideration of the education policies and objectives/NUIG***

- The loss of amenity area at NUIG has been carefully considered in the application documentation. Indeed, the proposed N6 GCRR has been designed with appropriate mitigation measures to ameliorate these effects. These measures are designed to minimise the impact upon the University.
- The N6 GCRR draws very considerable support from the policies and objectives in the City Development Plan, including Policy 7.4.2 'Education' to "support the future improvement and sustainable expansion of the NUIG and GMIT, recognising their contribution to the continued development of Galway as a Gateway."
- The road reservation is an integral component of the City Plan as indeed is the university campus, which enjoys CF (community, cultural and

institutional) and RA (recreation and amenity) land use zoning objectives. Each, i.e. the proposed road development and the University, is a vital component of the Galway of the future.

- S\_049 concludes with a “sweeper” objection which asserts that the N6 GCRR “constitutes a major breach of adopted plans and policy local, regional and national. The City and County Development Plans as well as the RSES, government policy “Smarter Travel” and the Galway Transport Strategy emphasise more **sustainable** forms of transport. We have already enjoyed a couple of decades worth of sustainable planning under the 2000 Act. The principles of sustainability are fundamental to Ireland’s spatial planning and capital investment framework for the next two decades at all planning levels as articulated at Section 4.6 (sustainable development) of this statement of evidence. Accordingly, the N6 GCRR enjoys support at all relevant levels.

***(e) Policy 2.5 for Outer Suburbs***

4.4.6 The development of the N6 GCRR took cognisance of the sustainable development principles of national, regional and local policies and has been developed to respond to “recent growth legacy issues” as described at Section 3.3 (pg. 42) of the NPF. The NPF also states that the “challenges to be addressed include housing choice and affordability, transport/mobility and urban quality, especially outside the core-city centre area”. This is examined at Section 2.4 of Chapter 2 of the EIAR.

4.4.7 It is considered appropriate to locate the proposed N59 Link Road South alongside Bothar Diarmada at the interface between Rosan Glas’s residential zoning to the east and the enterprise, industrial and related use zonings to the west. This accords precisely with the city development plan.

4.4.8 It is considered that the objectives for the Outer Suburbs at Section 2.5 of the City Development Plan are met, with the balance of achieving sustainable development for the city.

***(f) Policies and objectives in relation to Ardaun***

4.4.9 Submission S\_009 states that the proposed N6GCRR has negative implications for the Ardaun LAP lands and will sever Ardaun South from Ardaun North. It is stated at page 12 of the submission as follows:

- *There is no provision made for a public transport, cycling and pedestrian crossing of the M6/N6 in a North-South direction aligned with the Primary Cycle/Pedestrian Network in the Ardaun LAP. The Ardaun LAP envisaged a pedestrian-cycle bridge over the existing M6/N6 and provided for investigating, in the context of the GTS and an Area Based Transport Assessment, opportunities for a public transport crossing of the M6/N6. See Figure 20 & Figure 23*
- *There is no provision made for a pedestrian and cycling crossing of the R446 in an East-West direction aligned with the Primary Cycle/Pedestrian*

*Network in the Ardaun LAP. The Ardaun LAP envisaged such a crossing. See Figure 20 & Figure 23*

- 4.4.10 As set out in Section 2.5.2.2 of Chapter 2 of the EIAR, the Ardaun Local Area Plan (LAP) (2018-2024) seeks to deliver on the core strategy of the Galway City Development Plan 2017-2023, “*as a key development area that can accommodate long term growth in population, economic activity and employment opportunities*” (Section 1.1 Ardaun LAP).
- 4.4.11 Strategic Goal 4 of the Ardaun LAP (Section 3) supports the development of sustainable transport modes proposed in the City Plan and the GTS. This Strategic Goal is supported by the policy to “*promote interconnectivity between all modes of transport, in particular sustainable and public transport modes in order to efficiently link Ardaun with the main hubs for activity including the city centre in accordance with the GTS*”. This is further supported at Section 4.5 of the Ardaun LAP by the following key objective to “*support and facilitate the provision of an integrated public transport network to service Ardaun through the implementation of the Galway Transport Strategy and in conjunction with relevant transport providers, NTA and other stakeholders.*”
- 4.4.12 The Ardaun LAP reserves the corridor of the proposed road development as it traverses the LAP area, as per the City Plan objectives, Section 1.4 and Section 3.10. The Ardaun LAP has been developed over the years having regard to the corridor of the M6/N6 and the N6 GCRR maximises the reuse of this corridor, thus limiting disconnectivity within Ardaun.
- 4.4.13 The Ardaun LAP aligns with the Galway City Development Plan, the Galway Transport Strategy, and N6 GCRR.
- 4.4.14 Galway City Council, within the context of the GTS and the Ardaun LAP, has developed a separate transport strategy (i.e. Area Based Transport Assessment or ABTA) for Ardaun, to achieve the objectives of the Ardaun LAP, to ensure the delivery of sustainable transport development, and ensure the connectedness of the Ardaun lands. This ABTA specifically addresses public transport accessibility and pedestrian and cycle access, within the context of the adopted Ardaun LAP 2018-24 and the proposed N6 GCRR.
- 4.4.15 More recently, the commitment to sustainable transport at Ardaun has also been advanced through the Urban Regeneration and Development Framework (URDF) mechanism. A URDF application to upgrade the Martin Roundabout and the link road into the LAP lands to accommodate safer, more convenient public transport and pedestrian and cycling access at Ardaun was successful (c. €2.0 million). It has gone through the statutory process under Section 38 of the Roads Act and is currently advancing through the design stage.
- (g) No information regarding the standard set back for development access on the feeder roads to this roadway**
- 4.4.16 The City Development Plan 2017-23 does not have prescribed development setbacks from roads. The policies in the Plan including the development

management standards and guidelines included therein encourage the design and layouts to respond to the context. The ultimate relationship of buildings to a road is therefore guided by a number of elements including the prevailing urban form, site characteristics, proposed use and building design, urban design principles amenity requirements and is an issue that evolves through the development management process.

## 4.5 Galway County Development 2015-2021 (as varied) Plans Objectives

### Issues

4.5.1 The following issues have been raised in relation to certain policies and objectives of the Galway City and County Development Plans:

- (h) The acquisition of land to facilitate the construction of the N6 GCRR will result in significant tracts of lands, that will not be available for family members in Bearna to construct a single residential unit: Ob\_117, Ob\_134, Ob\_194, Ob\_195, Ob\_199, Ob\_207, Ob\_209 and Ob\_300
- (i) Concern regarding the removal of stone wall boundaries and replacement with timber fence and posts: Ob\_103, Ob\_108, Ob\_111, Ob\_116, Ob\_117, Ob\_125, Ob\_134, Ob\_147, Ob\_194, Ob\_195, Ob\_197, Ob\_199, Ob\_201, and Ob\_204
- (j) The extent of the Bearna area has been reduced in Variation No. 2(a) to the Galway County Development Plan. It is suggested that the proposed road development splits Bearna in two. The rural character of Bearna will be changed dramatically with the construction of the proposed N6 GCRR: Ob\_116, Ob\_135, Ob\_158, Ob\_179, Ob\_199, Ob\_201
- (k) To the east of the city no Local Area Plan is in place despite being located adjacent to the city administrative area: Ob\_677 & Ob\_678
- (l) Concerns regarding the potential of flooding that will be generated pre-and post-construction of the N6GCRR: Ob\_031 and Ob\_195
- (m) The proposed road breaches all (official) plans and policy at all levels: S\_049

### Responses

**(a) The acquisition of land to facilitate the construction of the N6 GCRR will result in significant tracts of lands that will not be available for family members in Bearna to construct a single residential unit**

4.5.2 Chapter 3, Urban and Rural Housing of the Galway County Development Plan 2015-2021, as varied contains policies and objectives in relation to the provision of urban and rural housing. The proposed N6 GCRR covers lands which are not zoned in the Galway County Development Plan or in any Local Area Plans. Several submissions Ob\_117, 134, 194, 195, 207, 209 and 300 have queried the loss of

their residential/agriculture lands to facilitate the construction of the proposed N6 GCRR. It is stated that these lands were to provide rural housing for family members and persons returning to the area.

- 4.5.3 Notwithstanding the loss of any such lands to accommodate the proposed road development, planning applications may still be submitted for development (including residential development) on other lands and any such application in respect of residential development will be assessed having regard to the rural housing qualifying criteria at Objectives RHO1 (a-e), RHO2, RHO3 and RHO4 of the Galway County Development Plan. In addition, there are lands zoned Residential and Town Centre in the Bearna Plan (Variation No. 2(a) of the Galway County Development Plan 2015-2021) where housing is permitted, and which would provide an alternative to rural housing.

**(b) Concern regarding the removal of stone wall boundaries and replacement with timber fence and posts**

- 4.5.4 Chapter 9, *Heritage, Landscape & Environmental Management* and Chapter 11 Development Management Standards of the Galway County Development Plan 2015-2021, as varied, contains policies, objectives and development management standards which include reference to stone walls. Several submissions Ob\_103, 108, 111, 116, 117, 125, 134, 147, 194, 195, 197, 199, 201 and 204 have queried the loss of stone walls and have objected to their replacement with timber post and rail fencing. The relevant provisions are contained at Objective NHB 11 - Trees, Parkland/Woodland, Stonewalls and Hedgerows and at Development Management Standard 41: Field Patterns, Stone Walls, Trees and Hedgerows of the County Plan.
- 4.5.5 The County Plan encourages the retention of natural boundaries including stone walls “wherever possible” as per Objective NHB 11. DM Standard 41 recognises the contribution of field patterns and the associated stone walls, trees and hedgerows to the visual and environmental quality of rural areas and stipulates the Council’s requirements for new development under four headings: (a) existing features, (b) intervention, (c) planting and (d) hedgerows. In general, minimum intervention with existing field patterns and boundaries is allowed and existing features will be retained in new layouts “wherever feasible”. Native trees and hedgerow planting is encouraged along all boundaries, and roadside frontages comprising native hedgerow with post and rail fencing will be considered where existing hedgerow is being removed pursuant to (d). These provisions equip the planning authority with a practical toolkit to deal with applications in a consistent manner as it deems appropriate to the particular circumstances.
- 4.5.6 Whereas these provisions are typically applied on an individual case by case basis mostly involving applications for rural housing, this application for approval for the proposed road development is a different proposition because the road crosses many field boundaries. The objections relate to the western part of the proposed road development in an area roughly between Baile Nua and Cappagh Road. Stone walls denoting field boundaries are a feature of rural Galway and are found in this area. This is the narrowest section of the proposed road development and comprises a single road carriageway in each direction. Nonetheless, the proposed road

development will disrupt existing field patterns and it will result in the removal of sections of stone walls. This is further addressed by Thomas Burns in his statement of evidence on landscape and visual.

- 4.5.7 In the case of the construction of the N6 GCRR, the provision of timber post and rail fencing is similar to the boundaries on other significant road projects in the county such as the M17/M18 and the M6. The mainline of the N6 GCRR will have timber post and rail fencing however along the realigned sections of the side roads the stone walls impacted will be replaced. The removal of the stone walls and replacement with timber post and rail fencing along the mainline of the N6 GCRR is considered an appropriate boundary treatment as this alignment did not originally have stone walls as a boundary. This is further addressed in Eileen McCarthy's statement of evidence.

**(c) Policies and objectives in relation to Bearná**

- 4.5.8 It is argued in submission/objection Ob\_116 and by others (Ob\_135, Ob\_158, Ob\_179, Ob\_199, Ob\_201) that the proposed road development is contrary to the policies and objectives in relation to Bearná. It is stated that *"the proposed route being so close to the village core has resulted in the greater Bearná area being split in two halves"*. It is also claimed that *"the location of the proposed route in the Bearná area has led to Galway County Council reducing by half the area including in the Bearná Local Area Plan L.A.P."* and that the construction of the proposed road development will dramatically change the rural character of Bearná.

- 4.5.9 Section 2.5.3.2 of Chapter 2 of the EIAR sets out the strategic vision for Bearná, under the Bearná Local Area Plan 2007-2017 which supports a new road to bypass the village and states it would have '...a positive impact for Bearná in that it will facilitate easy access to and from Bearná while reducing the volume of through traffic in the village. This would have a positive impact on the village centre and would help to create a more cycle and pedestrian friendly environment'.

- 4.5.10 In July 2018, the Galway County Development Plan 2015-2021 was varied through Variation No 2(a) to incorporate the "Bearná Plan". Section 1.2 of the Variation sets out the following vision for the sustainable development of Bearná.

*"The Bearná Plan is underpinned by a strategic vision intended to guide the future growth and development of the plan area in a sustainable manner. This vision seeks the achievement of the overall objectives set out for the village in the Galway County Development Plan and in a way that reflects the existing character and amenity of the area, its heritage, the surrounding landscape, the environment and improves the quality of life of residents and the local community."*

- 4.5.11 The following extract from the judgement of Simons, J in the case of Heather Hill Management Company CLG v An Bord Pleanála [2019] IEHC 450 refers to the status of the development plan for Bearná.

*"Somewhat unusually, the planning policy for Bearná has been adopted by way of a variation to the Galway County Development Plan rather than by way of the making of a local area plan ('LAP'). In effect, the planning policy for Bearná sits*

*as a chapter within the County Development Plan. Its provisions have the full force of a development plan, rather than the slightly attenuated status of an LAP. For ease of reference, I will refer to this as the 'Bearna Plan'. Of course, strictly speaking, it is not a separate plan, but rather forms part of the overall County Development Plan.*

- 4.5.12 Thus, the Bearna Plan is the relevant plan and its policies and objectives have the full force of a development plan, which are elevated relative to a local area plan. Bearna has expanded over the years with significant residential and commercial developments in the early 2000's which have resulted in the character of the village changing from a rural village on the outskirts of Galway City to an urban extension of the city. The strategic vision statement is *"To promote Bearna as a sustainable and vibrant coastal village, which maintains its attractive character, capitalises on its existing and future accessibility strengths, while offering a pleasant environment for a growing community, for living, shopping, education, business, recreation and tourism, all balanced against the need to safeguard and enhance the environmental sensitivities of the area, for present and future generations to come."* The preferred development option is a *"Refinement and Consolidation of the plan area"* based on *"Government policy to consolidate existing built-up urban areas....rather than the continual expansion and sprawl of such urban areas into the countryside, in order to achieve sustainable development"* (Section 1.4 of Variation no. 2 (a)). This resulted in a redefinition of previous development boundary.

- 4.5.13 Transport and Movement are addressed at Section 1.4.9 of the Bearna Plan and includes objective RT2 to form *"a new village street with high-quality mixed use development which would further enhance the vitality and success of Bearna village"* as follows.

*Objective RT2 – New Village Street*

*Support the completion of the proposed new Village Street (inner relief road) north of the existing R336 and prohibit and development that would affect the future construction of the approved route.*

- 4.5.14 The analysis above demonstrates that the submissions/objections of the N6 GCRR in relation to Bearna are unfounded. The Bearna Plan provides for the sustainable development of Bearna in accordance with the compact growth model and national planning policy. The proposed road development is remote from the development boundary of Bearna Village and will not split the settlement into two parts as is suggested. The partially completed inner relief road is an important transport objective in the Plan. The Bearna Plan was adopted in July 2018 when the emerging preferred route of the proposed N6 GCRR already formed part of the County Plan, so it was prepared with due consideration for the proposed route.

**(d) No LAP to east of Galway City**

- 4.5.15 The Galway County Development Plan 2015-2021 contains policies and objectives to ensure the proper planning and sustainable development of the county during the period of the plan. A number of submissions/objections Ob\_677 and Ob\_678 state that despite the location of an area adjacent to the city administrative area at east of the city there is no Local Area Plan in situ for this area. There are no land use zoning objectives in place in the Ballintemple area, so development in this area is subject to policies and objectives in the County Development Plan 2015-2021.

**(e) Potential of flooding that will be generated pre-and post-construction of the N6 GCRR**

- 4.5.16 A detailed Flood Risk Assessment of the proposed road development was carried out and is included in this application for Approval so this aspect is fully addressed. Chapter 8, Climate Change and Flooding of the County Plan contains objectives that accord with and refer to Circular PL2/2014 and the Planning System and Flood Risk Management (2009): Guidelines for Planning Authorities. Applications for permission and all development proposals made in the county following the construction of the proposed road development will be assessed by the planning authority in accordance with these Guidelines and the applicable policies in the County Plan.
- 4.5.17 In accordance with the Guidelines, Galway County Council adopts a managed risk approach to flooding which is to avoid, reduce and/or mitigate as appropriate. A strategic flood risk assessment was carried out as part of the county development plan process. Site specific flood risk assessment will be required in respect of development proposals as per the matrix in the Planning Guidelines which matches the vulnerability of the proposed development against the flood zone classification. Flood risk management policies and objectives are set out in the table at Section 8.7 of the Galway County Development Plan.

**(f) The proposed road development breaches plans and policies at all levels**

- 4.5.18 The principle of sustainable development is a major component of the Galway County Development Plan. It is reflected in the Plan's policies and objectives. The Galway County Development Plan 2015-2021(as varied) as stated at Section 2.5.3.1 of the EIAR, prioritises the delivery of the Galway County Development Plan. This Plan sets out its vision for the county which is to *“enhance the quality of life of the people of Galway and maintain the County as a uniquely attractive place in which to live, work, invest and visit, harnessing the potential of the County's competitive advantages in a sustainable and environmentally sensitive manner”*.
- 4.5.19 To implement this vision, the County Plan includes a number of strategic aims, one of which relates to infrastructural projects. The County Plan facilitates the development of infrastructural projects which underpin sustainable development.
- 4.5.20 Chapter 2 of the Galway County Development 2015-2021(as varied) outlines the key development strategy objectives of the county. Objective DS1 Development

Strategy supports and facilitates the sustainable development of the county. The preferred development option of the Galway County Development Plan recognises the associated Galway Metropolitan Area (NWRA Nov 2018), which includes the city together with a number of adjoining electoral divisions in the county which are inextricably and functionally linked to the city. The construction of the N6 GCRR aligns with the development strategy of the Galway County Development Plan.

- 4.5.21 Chapter 5 of the County Plan states that the provision of high quality transportation infrastructure within County Galway is critical to the county's socio-economic development and in its promotion of social and economic well-being.
- 4.5.22 The integration of the GTS, with the County Plan is described at Section 2.5.3.1 of Chapter 2 of the EIAR. Chapter 5 of the Galway County Development Plan states that Galway County Council together with Galway City Council, the NTA and TII are committed to delivering a sustainable transport vision for Galway where all elements of transport work together to achieve an integrated transport solution. This will be progressed in the city and its environs through the delivery of the GTS during the period up to 2035.
- 4.5.23 The Plan contains strategic policies and objectives that support this vision in the transport strategy including the following:
- *Policy TI 2-Development of an integrated and sustainable transport system*
  - *Objective TII-Sustainable transportation*
  - *Policy TII7 Protection of national road network*
  - *Policy TII8 and Objective TI 15 Transportation infrastructure requirements for the gateway and west of the county*
- 4.5.24 These policies and objectives support the provision of the GTS which includes measures which aim to address the transport problems across the city and its environs. The N6 GCRR is seen as part of the solution to the existing and future transportation problems.
- 4.5.25 The County Plan, at Section 5.1, further states that *“the timely provision of high quality transportation infrastructure within County Galway is critical to the County's socio-economic development and in the promotion of social and economic well-being”*. A new orbital route is deemed necessary for an enhanced sustainable transport network to focus on supporting trips that cannot be facilitated by more sustainable transport modes including city bound, cross-city and cross-county journeys. The additional capacity provided by an orbital route will increase the opportunities to re-allocate road space for use by pedestrians, buses and cyclists. The N6 GCRR is a key component of the GTS to ensure the delivery of the maximum benefits of full transport strategy for Galway in providing the necessary capacity and in supporting the delivery of sustainable transport measures.

4.5.26 The proposed road development is supported by the following:

- The N6 GCRR will function as part of the TEN-T network that includes the core transport routes in all EU Member States for all transport modes. The proposed road development forms part of the TEN-T comprehensive network in Ireland and is governed by EU regulations associated with such designation, which means the N6 GCRR will be a high-quality road with limited access. This ensures that the road functions as intended.
- The proposed N6 GCRR aligns with the strategic investment priorities in several national policy documents including the National Development Plan 2018-2027, the National Planning Framework-Ireland 2040 Our Plan and Regional Spatial and Economic Strategy. In the NPF, the delivery of the N6 GCRR is identified as a key future growth enabler for Galway. The Regional Spatial and Economic Strategy, also supports the delivery of the N6 GCRR and is subject to Regional Policy Objectives 3.6.7 and 6.6.
- The Infrastructure and Capital Investment Plan 2012-2016 Medium Term Exchequer Framework presents a Government-wide review of infrastructure, assesses the existing capacity and identifies remaining gaps in Ireland's infrastructure to be addressed to aid economic recovery, social cohesion and environmental sustainability. The proposed road development is consistent with the priorities of this review document in so far as it seeks to connect the west of County Galway to the national road network and the ability to improve mobility of people and goods into and out of Galway.
- The *Building on Recovery: Infrastructure and Capital Investment 2016-2021* presents the Government's new framework for investment in infrastructure in Ireland which prioritises spending on the areas of greatest need as the economy continues to grow. The N6 GCRR is consistent with the Roads Programme and schemes listed in the Galway County Development Plan which aims to remove traffic bottlenecks from a number of identified areas in the country including in Galway.

4.5.27 The proposed road development is recognised and complies with planning policy at every level. It is part of the TEN-T comprehensive land transport network. The proposed road development is a key future growth enabler for Galway in the NPF. Funding is provided in the NDP for the road project where it is classified as a strategic investment priority, which will enhance regional accessibility in the entire Region. The RSES identifies this proposed road development as a Regional Policy Objective necessary to align land use and transport to cater for the substantial projected increases in population and employment growth in the Galway Metropolitan Area.

4.5.28 The proposed road development is the subject of policies and development objectives in the statutory development plans for Galway City Council and Galway County Council. The corridor of the proposed road development is reserved on the zoning map in the City Plan. Both plans recognise that the proposed road development plays a vital role as a major improvement to the road network in the

city and the county and as part of an overall transport solution for Galway City and its environs. The proposed road development therefore assists in the achievement of the strategic vision in the respective functional areas for both planning authorities and accords with the proper planning and sustainable development of Galway.

## 4.6 Sustainable Development

### Issues

- 4.6.1 The following issues were raised in relation to sustainable development:
- (a) The proposed road development fails to meet national and regional objectives of sustainable development: Ob\_511.06; S\_009; S\_011 and S\_049
  - (b) Sustainable transport solutions need management buy-in at City and County level: S\_012
  - (c) Investment is required in sustainable transport modes including public transport, walking, cycling and light rail: S\_009; S\_049; Ob\_511.06 and S\_069
  - (d) Building the proposed road development is “business as usual” and does not represent the changes requires to decarbonise the economy and to avoid climate change: S\_009
  - (e) The proposed road development does not include public transport, cycling and walking facilities for crossing the N6/M6 and the R446 at Ardaun: S\_009

### Responses

#### *(a) Compliance with national & regional policies on sustainable development*

##### National Policies and Objectives

- 4.6.2 The principle of sustainable development is referred to in key provisions of the Planning and Development Act, 2000. Moreover, sustainable development is a fundamental principle of EU environmental law and, accordingly, sustainable development now has a significant impact on the presentation of environmental policy and law in Ireland. The relationship between sustainable development and the “need” for a development is a planning consideration. In this context as appears from the application documentation, the rationale or need for the proposed road development has been clearly established.
- 4.6.3 Policy documents including the National Spatial Strategy (NSS) 2002-2020, NESCs “Housing Ireland” (2004) and “Delivering Homes, Sustaining Communities” (2007) address the issue of sustainable development. The principal objectives in relation to sustainable development set at the national policy level, under the National Planning Framework (Project Ireland 2040) include:

**NPO 3b**

*Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.*

**NPO 52**

*The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the **sustainable** management to our natural capital.*

**NPO 54**

*Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaption objectives, as well as targets for greenhouse gas emissions reductions.*

**NPO 56**

***Sustainably** manage generation, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society.*

**NPO 63**

*Ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.*

4.6.4 Compact growth and enhanced regional accessibility are two of the ten Strategic Outcomes in the National Planning Framework. The strategic investment priorities in the NDP include housing and sustainable urban development, the national road network and environmentally sustainable public transport to support the NPF. Thus, sustainability is at the core of the planning and capital investment framework for the State in the next two decades.

4.6.5 The development of the proposed N6 GCRR takes cognisance of the sustainable development principles in national planning policy and is designed to respond to what the NPF describes as “recent growth legacy issues” and the “*challenges to be addressed include housing choice and affordability, transport / mobility and urban quality, especially outside the core-city centre area*”. The N6 GCRR is identified as a key growth enabler for Galway City and its suburbs and it forms part of a coherent overall planning response to the challenges set out in the NPF.

**Regional Policies and Objectives**

4.6.6 Section 2.4 of the EIAR sets out the regional policy heretofore (2.4.1 Regional Planning Guidelines (RPGs) for the West Region 2010-2022), and the Regional Spatial & Economic Strategy (RSES) for the Northern and Western region. The

RSES includes a Galway Metropolitan Area Strategic Plan, which is a strategic planning framework to achieve the following vision for Galway.

*The vision for Galway is that it will be a leading European city renowned for its quality of life, its history, its culture and its people. It is and will be a place that embraces modern technologies, high standards of education, competitive and sustainable enterprises.*

4.6.7 At the regional level, the principal objectives in relation to sustainable development in the RSES include:

**RPO 3.1** *Develop urban places of regional-scale through:*

- a) *Delivering on the population targets for the Metropolitan and Regional Growth Centres through **compact** growth*
- b) *Developing derelict and underutilised sites, with an initial/focus within town centres*

**RPO 3.2** *a) Deliver at least 50% of all new city homes targeted in the Galway MASP within the **existing built-up footprints** of Galway City and suburbs*

**RPO 3.6.3** *The Assembly support the preparation of a Buildings Height Study, a strategy to guide future sustainable development...*

**RPO 6.6** *In accordance with National Development Plan investment commitments to bring the following schemes through planning/design/construction, the following projects shall be delivered to an appropriate level of service in the short term and in any case by 2027 having regard to the standard in the NPF of an average inter-urban speed of 90KPH:*

- *A5 Road Development*
- *N4 Collooney to Castlebaldwin*
- *N5 Ballaghaderreen to Scramogue and Turlough to Westport*
- *N6 Galway City Ring Road*
- *N56 Dungloe to Glenties and Mountcharles to Inver*
- *N59 Moycullen to Bypass*

**RPO 6.14** *Support provision of Smarter Travel infrastructure*

**RPO 6.26** *.encourage a travel mode shift from private vehicular use towards sustainable travel modes of walking, cycling and use of public transport*

**RPO 6.30** *Planning at the local level should promote walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools*

- 4.6.8 Support for the N6 GCRR is firmly established in the Galway MASP in the RSES which includes the following Regional Policy Objective (RPO) 3.6.7.

***RPO 3.6.7*** *The Assembly supports the delivery of the infrastructure projects outlined below to develop the MASP:*

- Galway City Ring Road (S)
- Galway Transport Strategy (S/M/L)

- 4.6.9 Finally in this context, the Local Economic and Community Plan (LECP) for Galway City 2015-2021 contains this vision statement:

*“The Galway will be a successful city region with a creative, inclusive and innovative ecosystem in place to ensure its sustainable development into the future” (ecosystem: a complex network or interconnected system)*

- 4.6.10 The proposed N6 GCRR responds to the need for improved connectivity to the region and within the region and reducing transport costs by improvements to the road networks thereby contributing to the economic development of the region. It follows that the proposed road development aligns with national and regional sustainable development policy and is intended to deliver on these objectives. The N6 GCRR must be evaluated within this planning context and it is not being prioritised above regional planning considerations.

***(b) Sustainable transport solutions need management buy-in at City and County level***

- 4.6.11 Section 2.5.2.1 of Chapter 2 of the EIAR set outs the Core Strategy of the City Plan, which focuses upon the development of key regeneration locations to reinforce the *“prime role of the city centre in both Galway City and the Gateway Region”*. The NPF published in 2018, layers the ambition of regeneration with targeted population figures having an objective (National Policy Objective 3c) to accommodate 50% of the targeted 45,000 persons growth for Galway City and environs within the existing built up footprint.

- 4.6.12 The Galway City Development Plan 2017-2023 establishes the vision for Galway City *“to be a successful, **sustainable**, competitive, regional centre that creates prosperity, supports a high quality of life and maintains its distinctive identity and supports a rich cultural experience.”* The strategic goals include:

- **No.2:** Enable the city to fulfil its role as a National Gateway, a Regional centre and contribute to the economic recovery through the provision of balanced and **sustainable** economic opportunities for growth, innovation and investment across all employment centres and allow the role of the Gateway to harness the strengths and maximise the economic development of the West Region
- **No.4:** Apply the principles of **sustainability** particularly where it relates to the uses of land, buildings, water, energy, waste and through the encouragement of

**sustainable** modes of transport and the integration of transportation with land use

4.6.13 The core strategy focuses new residential development and housing growth in the Ardaun area of the city, while acknowledging that “*other residential areas of the city will grow but at a more constrained rate and in character with the established nature of development*”. It designates where the key centres of commercial, retail and local community activities are to be located “*to co-ordinate with the prime role of the city centre*”. The proposed road development facilitates the achievement of this Core Strategy. In line with the NPF national targets for population and jobs and focused compact urban growth, the City Plan identified a number of key brownfield regeneration sites. This core strategy ambition accords with the NPF in identifying these areas as locations where new communities will evolve.

4.6.14 At the local level, the principal policies in relation to sustainable development in the Galway City Development Plan include the following:

### **Galway City Development Plan 2017-2023**

#### Section 2 Housing and Sustainable Neighbourhoods

- Promote **sustainable** neighbourhoods where community facilities and services of an appropriate nature are easily accessible (pg. 25)
- Promote climate adaptation measures as part of the development of **sustainable** neighbourhoods (pg. 25)
- Support the development of sustainable communities and ensure that all new housing development- private, public and voluntary are carried out in accordance with DECLG guidelines **Sustainable Residential Developments in Urban Areas** (2008) and Section 28 Ministerial guidelines- **Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities** (2015) (pg. 27)
- **Sustainable** neighbourhoods can contribute to fostering community spirit, to reducing traffic movements and to the provision of high quality residential environments. They can also contribute to reducing greenhouse gas emissions through decreased travel demand, provision of sustainable transport networks....(pg. 28)
- Encourage higher residential densities at appropriate locations especially close to public transport routes and routes identified in the Galway Transport Strategy as sustainable for high frequency, **public transport** services, (pg. 28)

#### **Transportation Strategy Policy**

- Support and facilitate the integration of land use and transportation in order to facilitate the overall economic well-being of the city and to ensure the movement of people and goods in a manner that is safe and provides ease of

access for all, enhances quality of life and minimises environmental impact (pg. 41)

- Support the Galway Transport Strategy (GTS) and the associated implementation programme which will deliver a high quality public transport network, provide and encourage the use of other **sustainable** modes of transport, and facilitate the efficient movement of private vehicles and freight (pg. 41)
- Support the **N6 GCRR** project in conjunction with Galway County Council and Transport Infrastructure Ireland in order to develop a transportation solution to address the existing congestion on the road network and reduce the negative impact of vehicular traffic on the functioning and experience of the city centre and to facilitate city bound, cross-city, cross-county and strategic east- west movements (pg. 41)
- Support the reduction of greenhouse gas emissions through the promotion of **sustainable** land use and transportation (pg. 41)
- Continue to progress a sustainable transport solution for the city through the implementation of measures included in the GTS and required supporting projects in particular the N6 GCRR project (pg. 43)
- Support the GTS proposals for implementation of a local bus network (pg. 47) ... and for a primary and secondary cycle network....(pg. 50)
- Promote, facilitate and maintain maximum connectivity and permeability for pedestrians and cyclists....(pg. 50)

4.6.15 Similarly, the Galway County Development plan 2015-2021 refers to the principles of sustainable development and states *“The principle of sustainable development is a major component of the County Development Plan which is reflected in the Plan’s policies and objectives. The Core Strategy in the County Development Plan is supported and informed by the GTS.”* The Core Strategy of the Galway County Development Plan supports/accords with the proposed road development. This is addressed at Section 2.5.3.1 of the EIAR (pgs. 64, 65 and 66): The principal provisions in the County Plan relating to sustainable development include:

#### **Galway County Development Plan 2015-2021**

- It is the overarching objective of Galway County Council to support and facilitate the sustainable development of County Galway in line with the preferred development strategy option (pg. 22)
- Continue to recognise the defined Galway Transport and Planning Study Area, the commuter zone of Galway City, which requires careful management of growth and strong policies to shape and influence this growth in a sustainable manner (pg. 22)
- Integrate land use planning and sustainable transportation planning, promote the consolidation of development, encourage sustainable travel patterns by

reducing the need to travel particularly by private transport, while prioritising walking, cycling and public transport (pg. 22)

- It is national policy since 2009 that Ireland moves towards sustainable transport to reduce congestion and transport emissions, to support economic competitiveness and improve the quality of life for all. This policy emphasises the need to align land use transportation which encourages sustainable patterns of travel and this is reflected at national and regional level through spatial planning and transport policies (Section 5.1)
- *Policy TI 2-Development of an integrated and sustainable transport system*
- *Policy TI7 Protection of national road network*
- *Policy TI8 and Objective TI 15 Transportation infrastructure requirements for the gateway and west of the county*
- Objective TI 1- **sustainable** transportation

4.6.16 This analysis demonstrates that the proposed road development accords with all relevant policies and provisions pertaining to sustainable development at national regional and local levels. The concept of sustainable development is at the core of the vision in this suite of planning documents and is central to the formulation of policies and objectives to achieve that vision. Each tier of the planning hierarchy provides support for the proposed N6 GCRR, which is critical to the future expansion of Galway in accordance with the principles of proper planning and sustainable development pursuant to the Principal Act.

*(c) Investment is required in sustainable transport modes including public transport, walking, cycling and light rail*

#### **Compliance with sustainable transport options**

4.6.17 It is contended in submission S-049 and by others that the proposed development is “in major breach of adopted plans and policy” including the city and county development plans, which “talk about developing more sustainable forms of transport”. “Smarter Travel- A Sustainable Transport Future” is a policy framework approved by Government in 2009 which sets out how the vision of a sustainable travel and transport system can be achieved. At Chapter 3 of Smarter Travel, Government vision and high level targets, the policy acknowledges that “transport is vital for our economy. As an island nation we need good transport connections with our trading partners; we also need to ensure efficient movement on the island. Safe and comfortable travel is also a key element of a good quality of life. The issue is not to restrict travel and transport but to facilitate smarter ways of meeting these needs”. The principles of Smarter Travel underpin the Galway Transport Strategy, which, identifies the proposed ring road as a key project for its implementation.

4.6.18 The GTS identified the need to develop a sustainable integrated transport solution to accommodate existing and future travel demand, thereby facilitating the further sustainable growth of Galway City and in doing so aligns fully with Smarter Travel

policy framework. It is also stated in the GTS that “while it is a key challenge of this strategy to provide sustainable and reliable alternatives to travel by private car, the management of the road network will remain critical.” The proposed road development is described at section 3.3 of the GTS as follows.

*It is recognised that some journeys across the city are not always convenient by non-car modes such as cycling or public transport (for example, most ‘through’ journeys on National or Regional roads across the city, journeys with an origin or destination outside the city in rural areas, journeys late at night, etc.) Hence, it is considered necessary to provide a resilient/reliable cross-city route for travel by road. An orbital route (identified as part of the N6 Galway City Ring Road project) is considered to be an important part of providing this resilience. Providing additional orbital traffic capacity will increase the opportunities for re-allocation of existing road space for use by pedestrians, buses and cyclists, identified as a key traffic management objective of this strategy.*

- 4.6.19 Sustainable transport and the integration of land use and transportation planning are emphasised in the following extract from the RSES for the Northern and Western Region which endorse the Galway Transport Strategy as a best practice example of effective transport, spatial and economic planning (pg. 172 RSES).

#### SUSTAINABLE TRAVEL

*The close integration of transport spatial and economic planning provides the opportunity to deliver improved sustainable transport options for people and reduce dependency on the private car. This includes promoting walking, cycling, public transport, car-sharing, reducing travel through the use of technology or linked trips. Sustainable travel can have significant benefits for individuals, workplaces and education facilities in terms of health and wellbeing, costs and time associated with travel. It has the potential to reduce congestion and emissions and to exploit investment in sustainable transport.*

*A best practice example of where the integration of transport, spatial and economic planning is to be delivered, is the Galway Transport Strategy (GTS). The GTS should be used as a template elsewhere...*

- 4.6.20 The N6 GCRR accords with the key goals of Smarter Travel in its alignment of land use and transportation policy and in its objective to deliver viable and attractive travel alternatives to the private car in Galway. The construction of the N6 GCRR, which will facilitate the full implementation of the GTS, is predicted to increase modal shift to public transport.
- 4.6.21 Section 2.3.2 of Chapter 2, Planning and Policy, of the EIAR sets out how the proposed road development accords with sustainable transport policies at a national and a local level. This section notes that both the GTS and the N6 GCRR have been incorporated into the relevant Development Plans and are the adopted statutory transport strategy in both jurisdictions.
- 4.6.22 Chapter 3 of *Smarter Travel- A Sustainable Transport Future* outlines five key goals which form the basis of the Policy as follows:

- *Improve quality of life and accessibility to transport for all and, in particular, for people with reduced mobility and those who may experience isolation due to lack of transport*
- *Improve economic competitiveness through maximising the efficiency of the transport system and alleviating congestion and infrastructural bottlenecks*
- *Minimise the negative impacts of transport on the local and global environment through reducing localised air pollutants and greenhouse gas emissions*
- *Reduce overall travel demand and commuting distances travelled by the private car*
- *Improve security of energy supply by reducing dependency on imported fossil fuels*

4.6.23 Key actions set out in Smarter Travel- A Sustainable Transport Future to achieve this vision include:

- *Actions to reduce distance travelled by private car and encourage smarter travel, including focusing population growth in areas of employment and to encourage people to live in close proximity to places of employment and the use of pricing mechanisms or fiscal measures to encourage behavioural change*
- *Actions aimed at ensuring that alternatives to the car are more widely available, mainly through a radically improved public transport service and through investment in cycling and walking*

4.6.24 Achieving the targets in Smarter Travel policies will help create a more attractive, vibrant and economically competitive Galway City with associated health and environmental benefits. The proposed N6 GCRR aligns with these policies at national and local levels. *Smarter Travel – A Sustainable Transport Future* notes at page 36, that “the efficient movement of goods is vital to our competitiveness and economic welfare” with the majority of goods currently moved by road. It also acknowledges at page 51, that investment in roads will remove bottlenecks, ease congestion and pressures in town and villages. Therefore, the Smarter Travel actions seek to balance the multiple functions of the road network whilst still achieving the overall key goals.

4.6.25 Table 2 in Appendix B attached replicates Table 2.1 in Chapter 2 of the EIAR and sets out the Smarter Travel Actions Compliance Assessment in relation to the proposed road development. Table 2 demonstrates how the N6 GCRR aligns with the key goals and actions of *Smarter Travel*.

4.6.26 As noted at Section 2.3.2 of Chapter 2 of the EIAR (pgs. 41 and 42), Galway City and County Council developed the Galway Metropolitan Smarter Travel Area Action Plan 2010-2015 and *Galway City and Environs Walking and Cycling Strategy” (2010)* in response to the Smarter Travel policy, particularly the first key goal, which is to improve the quality of life and accessibility to transport for all.

- 4.6.27 Both Galway City and County Councils set out how Galway and its hinterland are to be developed as a sustainable travel area over the 20 years period of the transport strategy. The GTS reviewed both development plans together with all other policy documents which Galway City and County Councils had developed to promote sustainable travel policies. A full list of the statutory documents and the applicable guidelines providing the planning and policy context for the GTS is set out at Section 2.5 on page 20 of the GTS. In addition to the N6 GCRR, other projects identified in the GTS which support public transport, walking and cycling modes in the city are currently being progressed by Galway City Council and the National Transport Authority: these are the greenways from the city centre to Bearna and Oughterard and Galway BusConnects and the Cross City Link.
- 4.6.28 Substantial financial investment is planned in the necessary transport infrastructure to provide for the future sustainable development of Galway. The proposed road development is a major project involving considerable expenditure under the NDP and it is critical to the full implementation of the transport strategy in the GTS.

***(d) Building the GCRR is “business as usual” and does not represent the changes required to decarbonise the economy and to avoid climate change***

#### **Climate Change**

- 4.6.29 An appraisal of the proposed road development under the heading of Climate is included in Chapter 16, of the EIAR. Sinead Whyte in her statement of evidence will specifically deal with Carbon Emissions and Climate Change.
- 4.6.30 The Government has just published its Climate Action Plan 2019. The transport related provisions of the Climate Action Plan 2019 are set out at Section 3.2 above. Inter alia, this Plan states:

*“Ireland will miss the target set for the period 2013 to 2020 for renewables by about one eighth and for cumulative emissions by a little under 5%. However, more worrying is the expectation that recent growth in emissions, particularly from Industry, Agriculture, and Transport will put us on a trajectory to be over 25% off target for the next 2021-2030 accounting period. From sectors where Ireland has a binding commitment, i.e. activities outside the Emissions Trading System (ETS), a cumulative gap of 101 MtCO<sub>2</sub>eq. emissions is to be closed over the period to 2030.”*

*“Project Ireland 2040 sets out investments to provide for population growth in a compact, connected and sustainable way. It will deliver important infrastructures and contribute to closing the gap by 16.4 MtCO<sub>2</sub>eq.”*

*“Ireland will support the ambition emerging with the European Union to achieve a net zero target by 2050.”*

*“This Plan also reflects Ireland’s commitment to achieving the 2030 Sustainable Development Goals (SDGs). Agreed by the United Nations in 2015, the 17 SDGs address the environmental, economic, and social challenges that the world needs to tackle by 2030 to ensure a sustainable future. SDG 13 calls on countries to ‘take urgent action to combat climate change and impacts’, by implementing commitments to the United Nations Framework Convention on Climate Change,*

*as well as by improving public awareness of the need for Climate Action. Crucially, SDG 13 also calls on countries to integrate effective Climate Action measures into national policies. This all of Government Climate Action Plan does that, and places Ireland at the forefront of international efforts to achieve SDG 13.”*

4.6.31 These extracts confirm that the Government is under no illusion as to the magnitude of the task that Ireland faces in tackling climate change, and also of its resolution and commitment to discharging its obligations toward the attainment of a sustainable future.

4.6.32 The Climate Action Plan 2019 states *“Ireland will support the ambition emerging within the European Union to achieve a net zero target by 2050...”*. The Climate Action Plan refers to the National Planning Framework which anticipates a population increase of 1,000,000 grounded in compact, connected and sustainable spatial development and regionally balanced growth. The Plan recognises the challenge for the transport sector associated with the projected population and jobs growth in Project Ireland 2040 as is clear in the following extract from Section 10.1.

*By 2040, the population of Ireland is expected to grow by over 1 million to 5.7 million people. This growth, along with other National Planning Framework (NPF) growth projections on the economy and employment rates, will drive greater demand for transport across various modes, with increased movement of people and goods. While this is a sign of a vibrant economy, it intensifies our decarbonisation challenge, in particular as transport accounted for 19.8% of Ireland’s greenhouse gases in 2017.*

*...While Project Ireland 2040 will drive more compact, connected development, and new public transport networks, they will not on their own reverse the growth of emissions which are projected to grow by 25%.*

4.6.33 Fiscal measures to promote the electrification of all forms of transport are emphasised in the Climate Action Plan as these measures offer the most cost-effective abatement opportunity in the sector. The Government proposes policies to reduce the transport intensity of future growth through the compact growth model in the NPF and the expansion of walking, cycling and public transport options to promote modal shift. Other measures to reduce the carbon intensity of travel include, inter alia, as follows.

- ensuring the EV charging network underpins public confidence
- accelerating steps to decarbonise the public transport fleet
- enhancing priority for public transport
- developing a strategy for the heavy freight sector

4.6.34 Section 10.3 of the Plan outlines the measures to deliver the 2030 decarbonisation targets including the following policies and actions to support more ambitious outcomes in terms of ‘modal shift’. Actions nos. 85 to 100 in the Climate Action

Plan are designed to empower modal shift and the sharing economy in Transport, and include the following actions in Table 3 in Appendix C.

- 4.6.35 Improvements in public transport and the roll out of new cycling infrastructure are cited in several of the specific actions in the transport sector. The Galway Transport Strategy includes public transport and cycling proposals, which are consistent with those actions and together with the shift to electric vehicles will help to achieve the decarbonisation targets in the Plan. The sustainable transport approach in the GTS requires the implementation of the N6 GCRR to reduce city centre congestion and to facilitate the re-allocation of city road space for public transport, cycling and walking. The proposed road development is necessary to implement the transport strategy for Galway, from which it follows the N6 GCRR is consistent with the transport sector actions in the Climate Action Plan. The proposed road development will also facilitate further compact growth and more sustainable development of Galway City thereby reducing the transport intensity of future growth in accordance with the strategy for the transport section in Chapter 10 of the Climate Action Plan 2019.
- 4.6.36 The proposed N6 GCRR reduces congestion in the city and the emissions associated with that congestion and it facilitates the full implementation of the measures set out in the Galway Transport Strategy from which it follows that the road accords with the principles of the Climate Action and Low Carbon Development Act 2015, even allowing for increased traffic generated by the proposed road itself.

***(e) Public transport, cycling and walking facilities for crossing the N6/M6 & R446 at Ardaun***

- 4.6.37 Objectives in the Ardaun LAP 2018-2024, the current statutory plan for the area, include the provision of a pedestrian/cycle bridge across the N6/M6 with potential public transport routes within each of the two parts of Ardaun one either side of the N6/M6. The Ardaun Urban Design Framework Plan also includes provision for a pedestrian link across the R446 from the southern section of Ardaun (Figures 20 and 21 of the LAP refer). These provisions of the LAP will ensure full connectivity within Ardaun and with the city itself as the development of Ardaun unfolds. This is also addressed at paragraphs 4.4.19 to 4.4.15 above.

## 4.7 Proposed Modification to the Parkmore Link Road

- 4.7.1 As per the Statement of Evidence of Eileen McCarthy, it is proposed to modify the southern portion of the Parkmore Link Road.
- 4.7.2 In the original alignment, as proposed in the application documentation, the Parkmore Link Road passes through Ballybrit Business Park and links to the N6/Bóthar na dTreabh at the Morris Junction.
- 4.7.3 The modified alignment, which is now proposed by Galway County Council for approval by the Board passes along the east side of the Boston Scientific facility to the west of Galway Racecourse. This modified alignment connects into the proposed signalised junction at the City East Business Park junction at the N6/Bóthar na dTreabh. The modified alignment provides for the bus route and the primary cycle network envisaged in the original alignment.
- 4.7.4 It is useful to examine both the original alignment and the modified alignment now proposed having regard to the applicable provisions of the Galway City Development Plan 2017-2023, namely: (1) Vision/Strategic Goals/Core Strategy/Strategy; (2) Policies; and (3) Objectives. For ease of reference, the compliance of both the original and modified development with the provisions of the Galway City Development Plan 2017-2023 is demonstrated are set out in the three tables included in Appendix D to this statement of evidence.
- 4.7.5 The analysis set out in those tables demonstrates that both the original route alignment and the modified route alignment comply with the relevant planning policies and objectives in relation to transport infrastructure in the Galway City Development Plan 2017-2023.
- 4.7.6 Within the context of the overall N6 GCRR project, the original and modified alignments achieve comparable outcomes in terms of the road network improvements and the improved provisions for buses, cycling and walking. The only difference between the original and modified alignments is that a single section of the Parkmore Link Road at Ballybrit is located to the east of the original alignment. The modified alignment links to the N6/Bóthar na dTreabh at the City East Business Park Junction approx. 900m east of the connection at the Morris Junction identified in respect of the original alignment.
- 4.7.7 In terms of land use zoning, both alignments pass through identically zoned lands, namely lands zoned 'I' for Enterprise, Industrial and Related Uses and both provide comparable access to the business parks at Ballybrit and City East at Bóthar na dTreabh.
- 4.7.8 Figure 3.3 in the Galway City Development Plan 2017-2023 shows the proposed GTS core bus routes. Both the original and modified alignments serve Parkmore/Ballybrit and connect into the network of core bus routes.
- 4.7.9 Figure 3.5 in the City Plan shows the proposed cycling network. Both route alignments connect with the primary cycle network at Bóthar na dTreabh.

- 4.7.10 It follows therefore that both the original and modified alignments achieve the objectives for the N6GCRR project and the Galway Transport Strategy, which are identified at Policy 3.3 of the Galway City Development Plan 2017-2023 as necessary “to progress a sustainable transport solution for the city.”
- 4.7.11 Both alignments form part of the Parkmore Link Road element of the overall proposed road development and fulfil objectives in the City Plan to improve transport provision for all modes including for cyclists and pedestrians. Each alignment encourages sustainable modes and supports plan-led growth based upon the close integration of transport infrastructure and land use in this key employment area of the city helping to deliver the Core Strategy. Save for the proposed modified routing within Ballybrit Business Park the rest of the proposed Parkmore Link Road is unchanged. Both alignments facilitate the development of Galway City and its environs within the strategic framework of the Galway Transport Strategy (GTS) which identifies the transport infrastructure and services required to achieve the Vision in the City Plan.
- 4.7.12 Accordingly, both the original and modified alignments comply with the relevant policies and objectives of the Galway City Development Plan 2017-2023.

## **4.8 N6 Galway City Ring Road and Other Developments**

- 4.8.1 The proposed road development passes adjacent to lands wherein it is proposed to provide residential properties. Issues in this regard were raised in submissions / objections Ob\_229, Ob\_261, Ob\_469, and Ob\_484.
- 4.8.2 Applications for approval for Strategic Housing Development (SHD) have been or are expected to be submitted on the above lands. In response, you are referred to Section 4.8 of the Statement of Evidence of Eileen McCarthy. The status at the date of this enquiry in relation to each plot is set out as follows.
- 4.8.3 Ob\_229: An SHD application for 238 residential units on the lands to the south of the proposed road development at plot 229 was made in June 2019 after the date of this application for approval for the N6 GCRR. Accordingly, the proposed SHD development took cognisance of the proposed road development in all important respects, indeed, the storm and foul services for this SHD are to be accommodated beneath the footprint of the proposed N6 GCRR ensuring both schemes are compatible. Approval was granted for this development on 10 December 2019, reference ABP-304762-19.
- 4.8.4 Ob\_469: An SHD application for 332 apartments was made in November 2019 on the lands at plot 469. Similarly, this residential proposal takes due cognisance of

the proposed road development and there is no conflict between the proposed road development and this SHD reference ABP PL61.305982.

- 4.8.5 Ob\_261 & Ob\_484: Any future development at plots 261 and 484 will have due regard to the current application for approval for the proposed road development including, inter alia, the provision of visual screening, fencing, appropriate drainage infrastructure, etc
- 4.8.6 Finally, the Galway City Council Planning Register confirms that the NUIG (Ob\_528\_541\_543\_557) lodged an application (Ref. No. 19/372) for permission to develop a 1 no. 3G pitch and 1 no. grassed GAA/soccer pitch plus all ancillary infrastructure and site works on a 8.92ha site at the NUI Galway Sports Grounds, Dangan, Galway. The proposed development also seeks permission for temporary changing room facilities and a shared access lane for emergency/maintenance vehicles and pedestrians during the construction phase of the N6 Galway City Ring Road. This application is accompanied by a Natura Impact Statement. A decision on the planning application has not been made at the time of writing. From the lodged plans and particulars, this proposal would not conflict with the proposed road development, noting also that temporary changing rooms and access are sought to facilitate maintenance and pedestrian access for the duration of the construction works of the proposed road development.

## 5 Conclusion

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- 5.1 As stated at Section 5.3.4.5 of the County Galway Development Plan 2015-2021.
- 5.3.4.5 *The N6 Galway City Ring Road (N6GCRR)*
- The provision of a new orbital route is considered necessary for an enhanced sustainable transport network as it will focus on supporting trips that cannot be facilitated by sustainable travel measures including city-bound, cross-city and county movements. This additional capacity provided by an orbital route will increase the opportunities for re-allocation of existing road space for use by pedestrian, buses and cyclists. In this regard, the orbital route identified as the N6GCRR project (being undertaken by Galway County Council on its own behalf and on behalf of the City Council and TII) is considered to be a critical part of the transport strategy for the county to deliver the necessary capacity and support the delivery of sustainable transport measures.*
- 5.2 It seems to be broadly accepted that Galway’s problem of traffic congestion needs early urgent attention not least because of the increased mobility requirements of another 45,000 population growth over the next 20 years. The Galway Transport Strategy, which expressly envisages the proposed N6 GCRR provides a planning solution which complies with the principles and policies of sustainable development at EU, national, regional and local levels.
- 5.3 In terms of the principles of proper planning and sustainable development, the N6 GCRR complies with, and implements, a number of policies and objectives set at European Union, national, regional and local level.
- 5.4 At the EU level, the Trans-European Transport Network (TEN-T) policy addresses the implementation and development of a Europe-wide network of railway lines, roads, inland waterways, maritime shipping routes, ports, airports and railroad terminals.
- 5.5 In considering the proposed road development, the Board is required, in terms of national policy, to have regard to the National Planning Framework which identifies the N6 Galway City Ring Road as a key future growth enabler and to the National Development Plan, which prioritises capital investment including major transport infrastructure to achieve the national strategic outcomes in Project Ireland 2040.
- 5.6 The Board is required to have regard to the regional spatial and economic strategy for the Region. In particular, the RSES provides the Metropolitan Area Strategic Plan [MASP], which identifies the guiding principles for the sustainable development of the Galway Metropolitan Area to accommodate the projected growth in population and employment in the plan period.
- 5.7 Locally, the corridor for the N6 GCRR is reserved on the land use zoning map in the Galway City Development Plan 2017-2023 and the proposed ring road is endorsed in the Plan’s policies including Policy 3.3 which is “to progress a sustainable transport solution for the city through the implementation of measures

*included in the GTS and required supporting projects in particular the N6 GCRR project”.*

- 5.8 Similarly, the Galway County Development Plan 2015–2021, which is a mandatory consideration for the Board, provides fulsome policy support for the proposed road development, including a number of policies and objectives facilitating the proposed development.
- 5.9 Sustainable principles have been employed in the evolution of a proposed road development in the interests of the common good in accordance with the proper planning and sustainable development.
- 5.10 The proposed road development complies with all relevant policies at EU, national regional and local levels. Each tier of the hierarchy supports the N6 GCRR, which is critical to the growth of Gateway Galway.

**Appendix A**

Planning & Policy Context

Statement of Evidence

Table 1 Strategic Outcomes of the National Planning Framework

**Table 1: Strategic outcomes of the National Planning Framework**

Strategic Outcome	Provision of N6 GCRR
Compact growth	<p>The N6 GCRR provides the necessary infrastructure to attract traffic from the city centre zone and allow the city to grow to the necessary densification identified in the NPF. By tackling the city's congestion issues, it will provide a better quality of life for the city's inhabitants and a safer environment in which to live. By reducing the number of cars on the roads within the city centre and improving streetscapes, workers and students are facilitated to commute using multi-modal transport means. This includes travelling on foot, by bicycle and on the public transport system.</p>
Enhanced regional accessibility	<p>The N6 GCRR provides a strategic route across the River Corrib without the need to go through the city. The road alignment and junction layout for the N6 GCRR have been designed to preserve the strategic function of the proposed road in the longer term and to ensure that the future accessibility requirements for the West Region, i.e. the county areas and hinterland beyond the city zone, are sustained at a level to support a safe and efficient service that will support a viable regional economy.</p>
Strengthened Rural Economies and Communities	<p>As a Gateway to the Connemara and the West Region, connectivity and accessibility to and through Galway City is essential in aiding the region to revitalise, improve and develop into the future. Accessibility and connectivity for areas within the county is of significant public interest and a key driver for this proposed road development.</p> <p>Providing well developed transport links to the West Region, enables enterprises and the local economy of the west to grow and develop as a viable alternative to the east coast corridor which is of significant public interest at a national level. More sustainable and reliable infrastructure links to and from the Gaeltacht areas of the West Region, enables Irish language speakers to remain in their native areas out of choice, and develop its economy in a way that is both language and culture friendly. This can help redress the recent pattern of decline in population in such rural areas and support more sustainable communities. This is of public interest as it is of national interest to preserve our heritage including our native language, our first official language. Provision of reliable transport infrastructure also facilitates improved access to employment, education, vital services such as hospitals and amenities for all users.</p> <p>As outlined above, the proposed road development will support and encourage more sustainable travel with the reallocation of road</p>

Strategic Outcome	Provision of N6 GCRR
	<p>space to walking, cycling and public transport and the extension of these networks into the county areas. This is of overriding public interest at a local level in Galway itself, but more importantly for the entire West Region as Galway is at the core of the region and needs to be able to function efficiently to serve the region.</p>
Sustainable Mobility	<p>When considered within the wider context of the comprehensive suite of transportation measures in the GTS, the N6 GCRR will reduce congestion thereby reducing emissions and it will facilitate significant planned improvements in the public transport network and services as well as enhanced provision for active modes. The GTS is necessary to address existing congestion and to provide for sustainable growth in the city region with future residential and employment development taking place within the footprint of the existing built-up area and on greenfield lands supported by the proper provision of public transportation, cycling and walking options.</p>
A strong economy, supported by Enterprise, Innovation and Skills	See above
High quality international connectivity	<p>The N6 GCRR is of European importance given that the TEN-T comprehensive network designation extends west of the city to the terminus of the proposed road development and will provide a link to the West Region of the standard of a comprehensive route in accordance with TEN-T</p>
Enhanced amenity and heritage	See above
Transition to a low carbon and climate resilient society	<p>The N6 GCRR, notwithstanding its scale, is one component in the overall integrated sustainable transport solution for Galway City and its environs. It facilitates the opportunity to develop and deliver more sustainable transport modes and in doing so is an integral part of the overarching GTS. The N6 GCRR attracts non-essential traffic from the city centre facilitating the reallocation of road space to more active and sustainable transport modes. It will also reduce traffic congestion and facilitate real improvements in public transport priority in the city centre. This will lead to the opportunity to have a modern, functioning public transport service with the associated improvements in terms of a more comprehensive network, integrated ticketing, increased frequency and more reliable journey time. The resulting cleaner safer environment in the city also supports a modal transfer from car transport to increased levels in walking and cycling. This is smarter travel with all components working together. Therefore, it is necessary to assess the entirety of</p>

<b>Strategic Outcome</b>	<b>Provision of N6 GCRR</b>
	the strategy for transport and all the associated measures rather than focus on the project as an isolated single component in the context of a discussion on carbon generation.
Sustainable management of water and other environmental resources	The drainage of the existing road network, having evolved in a different era is not managed in a sustainable manner. In contrast the design for drainage provision on the N6 GCRR accords with best environmental practices and ensure that the associated drainage will secure sustainable management of water.
Access to quality childcare, education and health services	Having an integrated transport strategy which includes the N6 GCRR enables increased and better access to facilities thereby contributing to an environment with more and better choices and flexible opportunities. This contributes to the promotion of increased social inclusion.

**Appendix B**

Planning & Policy Context

Statement of Evidence

Table 2 Smarter Travel Compliance and the N6 Galway City Ring Road

**Table 2: Smarter Travel Compliance and the N6 Galway City Ring Road**

(How the N6 GCRR aligns with the key Actions of Smarter Travel)

Actions of Smarter Travel	Comments
<p>Actions 1, 2, 3, 4, 7, 8, 9 – Integration of land use planning and transport policies, and across local authorities in the regional authority area.</p> <p>Mobility Management towards more sustainable travel options.</p>	<p>The targeted reallocation of road space to facilitate the provision of new and improved pedestrian and cycling facilities promotes walking and cycling to access community facilities and public transport throughout Galway City.</p> <p>Provision of new pedestrian and cycle facilities in all areas of overlap with proposed GTS measures.</p> <p>The proposed road development comprises two local authority areas, namely Galway City Council and Galway County Council, with Galway County Council progressing the proposed road development through the statutory process on behalf of itself and Galway City Council.</p> <p>Provision of segregated safe routes for pedestrians and connections to dedicated cycle ways and footways connecting to existing networks linking schools, workplaces and residential areas.</p>
<p>Actions 12, 13, 14 – Public Transport improvement measures, including park &amp; ride.</p>	<p>The provision of the proposed road development will reduce the current congestion in Galway City Centre and facilitate the provision of a public transport corridor through the city centre.</p> <p>Facilitate the provision of future Park &amp; Ride along major public transport routes.</p>
<p>Actions 15, 16 – Cycling and Walking</p>	<p>The provision of the proposed road development supports Action 15, through the provision of dedicated high quality safe pedestrian and cycling facilities linking the residential areas and employment areas.</p> <p>The reduction in traffic volumes in Galway City Centre due to the transfer of traffic to the new alignment will afford the opportunity to materially improve the cycling and pedestrian infrastructure.</p>
<p>Action 22 Establish Park and Ride facilities</p>	<p>The provision of the Parkmore Link Road and the bus lane on Ballybrit Crescent Road facilitate the establishment of future park and ride sites along major public transport modes. These provisions form part of the overall plan for park and ride facilities in the GTS.</p>
<p>Action 23 Improved road priority for walking and cycling access to key public transport interchanges</p>	<p>Signalised junctions are provided within the proposed road development to enhance operational safety and performance and to facilitate the efficient movement of all road users. Dedicated crossing points for pedestrians and cyclists are provided at each junction location.</p> <p>The traffic reductions in Galway City Centre will afford the opportunity to improve the pedestrian priority at the key junctions.</p>

<b>Actions of Smarter Travel</b>	<b>Comments</b>
Action 25 Ensure investment reflects the priority of walking, cycling, public transport in the policy in Smarter Travel	<p>The proposed road development provides investment for new dedicated, safe walking and cycling routes linking residential areas to employment areas and the city centre. The reduction in traffic volumes in the city centre will facilitate further improvement to the pedestrian and cycling infrastructure within the city centre.</p> <p>The proposed development will provide economic benefits through alleviation of the congestion and journey time reliability.</p>
Action 30 Address road safety and emissions reduction.	<p>The provision of the proposed road development will provide a safer road for motorised traffic, remove traffic including heavy goods vehicles from congested urban areas and facilitates the reallocation of the existing road space for public transport and non-motorised transport, thus supporting a mobility that is efficient and is a safer environment for active modes.</p>
Action 42 local authorities empowered to prepare transport plans to complement their development plans and to set targets for achieving sustainable travel and transport services in their areas	<p>The proposed road development forms a key component of the overall GTS, which is developed to achieve sustainable travel and transportation services in Galway city and environs. The proposed road development assists in modal shift through the provision of bus lanes and safe segregated pedestrian and cycle facilities connecting residential areas and employment zones</p>

**Appendix C**

Planning & Policy Context

Statement of Evidence

Table 3 N6 Galway City Ring Road Compliance with Actions Nos. 85-100  
of Climate Action Plan 2019

**Table 3: N6 Galway City Ring Road Compliance with Actions Nos. 85-100 of Climate Action Plan 2019**

Action	Description of Action
85	transition the urban PSO public bus fleet to LEVs
86	set a road map for more LEVs in public sector fleets
88	Increase public bus network capacity and usage (implementation of BusConnects services network)
89	Establish a “Park and Ride Development Office” within NTA and develop overall Park and Ride Implementation Plan, including the provision of multimodal facilities (e.g. EV charging/bicycle parking)
91	Undertake an expansion of cycling infrastructure through the establishment of a “Cycling Project Office” within the National Transport Authority and develop an implementation plan
94	review public and sustainable transport policy and develop a roadmap to electrify decarbonise all PSO public transport
95	Develop and implement cycle network plans for all major cities
96	Review and bring forward a revised implementation plan for the outstanding policies and actions in the 2009-2020 policy Smarter Travel, A Sustainable Transport Future, in time for Budget 2020
97	Commence full implementation of the National Cycle Policy Framework
98	All cities with a population exceeding 75,000 to produce a sustainable transport plan by no later than June 2020 for review by the NTA and DTTAS

## **Appendix D**

Planning & Policy Context

Statement of Evidence

Table 4 Galway City Development Plan 2017-2023  
Vision/Strategic Goals/Core Strategy/Strategy

Table 5 Galway City Development Plan 2017-2023 Policies

Table 6 Galway City Development Plan 2017-2023 Objectives

**Table 4: Galway City Development Plan 2017-2023 Vision/Strategic Goals/Core Strategy/Strategy**

Galway City Development Plan 2017-2023 Vision/Strategic Goals/Core Strategy/Strategy	Original Alignment	Modified Alignment
<p><b>Vision for Galway City</b></p> <p><i>“A successful, sustainable, competitive regional centre that creates prosperity, supports a high quality of life and maintains its distinctive identity and supports a rich cultural experience”</i></p>	<p>√</p> <p>Accords with the Vision</p>	<p>√</p> <p>Accords with the Vision</p>
<p><b>Strategic goals include:</b></p> <p><i>Enable the City to fulfil its role as a National Gateway, a Regional Centre and contribute to the economic recovery through the provision of balanced and sustainable economic opportunities for growth, innovation and investment across all employment sectors and allow the role of the Gateway to harness the strengths and maximise the economic development for the whole West Region</i></p> <p><i>Apply the principle of sustainability particularly where it relates to the uses of land, buildings, water, energy, waste and through the encouragement of sustainable modes of transport and the integration of transportation with land use.</i></p>	<p>√</p> <p>Alignment supports balanced and sustainable economic opportunities for growth, innovation and investment...</p> <p>Provides for buses, cycling and walking</p>	<p>√</p> <p>Alignment supports balanced and sustainable economic opportunities for growth, innovation and investment...</p> <p>Provides for buses, cycling and walking</p>
<p>The <b>Core Strategy</b> aligns land use with investment in sustainable transportation and the city transport strategy aims <i>“to integrate sustainable land use and transportation, facilitating access and choice to a range of transport modes, accessible to all section of the community that ensures safety and ease of movement to and within the city and onward connectivity to the wider area of County Galway and the West Region”</i>.</p>	<p>√</p> <p>Alignment will facilitate access and increase the range of transport modes, enhance accessibility and will help deliver the Core Strategy</p>	<p>√</p> <p>Alignment will facilitate access and increase the range of transport modes, enhance accessibility and will help deliver the Core Strategy</p>
<p>The <b>Core Strategy</b> is supported and informed by the Galway Transport Strategy...(and) is also informed by the ongoing N6 Galway City Ring Road (N6GCRR) project.</p>	<p>√</p>	<p>√</p>

Galway City Development Plan 2017-2023 Vision/Strategic Goals/Core Strategy/Strategy	Original Alignment	Modified Alignment
<p><b>5.1 Economic Activities Strategy</b></p> <p>Support and facilitate the sustainable economic development of Galway as a Gateway for the West Region.</p> <p>Enhance the economic performance of Galway as a Gateway and regional growth centre by addressing the identified current transportation problems in addition to providing for the future transportation requirements through the delivery of the Galway Transport Strategy and the N6 Galway City Ring Road.</p>	<p>√</p> <p>Complies with economic activities strategy</p> <p>addresses transport problems through the delivery of GTS and N6 GCRR</p>	<p>√</p> <p>Complies with economic activities strategy</p> <p>addresses transport problems through the delivery of GTS and N6 GCRR</p>

**Table 5: Galway City Development Plan 2017-2023 Policies**

Galway City Development Plan 2017-2023 Policies	Original Alignment	Modified Alignment
<p><b>Policy 3.2</b> Land Use and Transportation states:</p> <p>Promote close co-ordination between land use and transportation through policies, land use zoning and objectives.</p> <p>Facilitate the future development of Galway City and environs within the strategic framework of the Galway Transport Strategy (GTS) and associated implementation phasing to ensure that the city has the necessary transport infrastructure and services to support its continued growth and development.</p> <p>Provide for development of high volume, trip intensive, developments such as commercial centres and employment hubs at locations that will minimise the need, distance and time taken to travel and promote the use of sustainable transport modes such as walking, cycling and public transport to access these locations.</p>	<p>√</p> <p>complies</p> <p>Facilitates future development of the city as per the GTS by providing necessary transport facilities</p> <p>Provides for such developments at key employment hub at Ballybrit/Parkmore</p>	<p>√</p> <p>complies</p> <p>Facilitates future development of the city as per GTS by providing necessary transport facilities</p> <p>Provides for such developments at key employment hub at Ballybrit/Parkmore</p>
<p><b>Policy 3.3</b> Galway Transport Strategy (GTS)</p> <p>Continue to progress a sustainable transport solution for the city through the implementation of measures included in the GTS and required supporting projects in particular the N6 GCRR project”.</p>	<p>√</p> <p>Delivers elements of sustainable transport solution</p>	<p>√</p> <p>Delivers elements of sustainable transport solution</p>
<p><b>Policy 3.5</b> Public Transport</p> <p>Support the GTS proposals for the implementation of a local city bus network which will include for a high frequency cross-city network of services and all associated infrastructural requirements, traffic management and priority arrangements.</p> <p>Promote the availability of the city bus network...</p> <p>Facilitate the provision of park and ride facilities in conjunction with the provision of the public transport network as proposed in the GTS.</p>	<p>√</p> <p>Supports..</p> <ul style="list-style-type: none"> <li>• Local city bus network</li> <li>• High frequency cross-city network of services ...</li> </ul> <p>Route alignment caters for city bus route</p> <p>Supports delivery of Park and Ride as per the GTS</p>	<p>√</p> <p>route supports..</p> <ul style="list-style-type: none"> <li>• Local city bus network</li> <li>• High frequency cross-city network of services ...</li> </ul> <p>Route alignment caters for city bus route</p> <p>Supports delivery of Park and Ride as per the GTS</p>

<b>Galway City Development Plan 2017-2023 Policies</b>	<b>Original Alignment</b>	<b>Modified Alignment</b>
<p><b>Policy 3.6</b> Cycling and Walking</p> <p>Support the Galway Transport Strategy proposals for a primary cycle network to facilitate safe and convenient medium distance journeys.</p> <p>Support the Galway Transport Strategy proposals for a secondary cycle network and feeder links to facilitate safe and convenient local journeys and to afford linkage into the primary cycle network.</p> <p>Promote, facilitate and maintain maximum connectivity and permeability for pedestrians and cyclists in the design of new developments and in upgrading existing developments in accordance with the Design Manual for Urban Roads and Streets (2013) and Permeability a Best Practice Guide NTA (2015)</p>	<p>√</p> <p>Delivers elements of primary cycle network</p> <p>Supports proposals for secondary cycle network and feeder links to primary cycle network</p> <p>connectivity and permeability for pedestrians and cyclist enhanced as per DMURS and NTA Guide</p>	<p>√</p> <p>Delivers elements of primary cycle network</p> <p>Supports proposals for secondary cycle network and feeder links to primary cycle network</p> <p>connectivity and permeability for pedestrians and cyclist enhanced as per DMURS and NTA Guide</p>
<p><b>Policy 3.7</b> Road and Street Network and Accessibility</p> <p>Support the N6 Galway City Ring Road project in connection with Galway County Council and Transport Infrastructure Ireland (TII) in order to develop a transportation solution to address the existing congestion on the national and regional road network</p> <p>Facilitate the sustainable development of Galway City supported by a transport solution that ensures the city has the necessary transport infrastructure and services, capable of optimising the capacity for modal shift and enhanced public transport options</p>	<p>√</p> <p>Proposed road development reduces congestion on road network</p> <p>Alignment comprises transport infrastructure improvements to cater for growth and to provide for modal shift to buses and other active modes</p>	<p>√</p> <p>Proposed road development reduces congestion on road network</p> <p>Alignment comprises transport infrastructure improvements to cater for growth and to provide for modal shift to buses and other active modes</p>
<p><b>Policy 5.1</b> Enterprise</p> <p>Support the implementation of the phased plan of transportation measures as proposed for in the Galway Transport Strategy including for public transport, walking and cycling, and a strategic new road, the N6 GCRR.</p>	<p>√</p> <p>Alignment complies with enterprise policy in relation to public transport, cycling and walking.</p>	<p>√</p> <p>Alignment complies with enterprise policy in relation to public transport, cycling and walking.</p>

Galway City Development Plan 2017-2023 Policies	Original Alignment	Modified Alignment
<p><b>Policy 10.2</b> City Centre</p> <p>Maintain and enhance the quality of the city centre public realm and enhance accessibility and connectivity to and within the city centre through implementation of measures included in the Galway Transport Strategy</p>	<p>√</p> <p>Alignment supports measures to reduce traffic in the city centre, improving the public realm and accessibility.</p>	<p>√</p> <p>Alignment supports measures to reduce traffic in the city centre, improving the public realm and accessibility.</p>

**Table 6: Galway City Development Plan 2017-2023 Objectives**

Galway City Development Plan 2017-2023 Objectives	Original Alignment	Modified Alignment
<p><b>3.10 Specific Objectives</b></p> <p><u>Traffic and Road Network (several objectives)</u>            Implement the programme of actions and measures as provided for in the Galway Transport Strategy in partnership with the National Transport Authority and on a phased and co-ordinated basis, based on priority needs.</p> <p>Reserve the preferred route corridor of the N6 Galway City Ring Road project which has been selected to accommodate the requirements of the emerging strategic road and the associated bridge crossing of the River Corrib.</p> <p>Give priority to the reservation of the N6 GCRR Preferred Route Corridor and the associated land requirements over other land uses and objectives in the City Development Plan and prohibit developments within the corridor which could potentially prejudice the development of the strategic road and the river crossing.</p> <p>Investigate and develop road improvements, junction improvements and traffic management solutions in the context of the GTS and strategic developments, to maximise the operating efficiency and safety of the network having regard to the requirements of all categories of road users and road network capacity constraints. Such solutions or interventions will be developed in conjunction with the relevant agency, such as the TII, NTA, and the Department of Transport, Tourism and Sport, and will where necessary be subject to the requirements and consenting procedures of the Planning and Development Acts and the Roads Act.</p> <p><u>Public Transport</u>            Implement traffic management and infrastructure changes to facilitate the development of a public bus network in accordance with the GTS</p> <p>Support the improvement of access for public transport, pedestrian and cyclists to and within major employment areas and institutions.</p> <p><u>Cycling</u>            Implement traffic management and infrastructure changes to facilitate the development of a cycle</p>	<p>√</p> <p>Accords with traffic and road network in the GTS</p> <p>Achieves the requirements of the GTS</p> <p>Alignment is consistent with and delivers the GTS objectives.</p> <p>Alignment at Ballybrit Business Park is fulfils these objectives for all road users.</p> <p>Enables improved bus network</p> <p>Complies with objectives for public transport and other active modes.</p> <p>Delivers cycle network.</p>	<p>√</p> <p>Accords with traffic and road network in the GTS</p> <p>Achieves the requirements of the GTS</p> <p>Alignment is consistent with and delivers the GTS objectives.</p> <p>Alignment at Ballybrit Business Park is fulfils these objectives for all road users.</p> <p>Enables improved bus network</p> <p>Complies with objectives for public transport and other active modes.</p> <p>Delivers cycle network.</p>

<p>network including for a core, secondary and feeder network in accordance with the GTS</p> <p><u>Pedestrian</u>          Improve permeability withing residential neighbourhoods, commercial areas and workplaces</p>	<p>Permeabilty at established commercial area at Ballybrit/Parkmore enhanced as per the objective.</p>	<p>Permeabilty at established commercial area at Ballybrit/Parkmore enhanced as per the objective.</p>
<p>Zoning Objective 'I Enterprise/Industrial and related'</p>	<p>√</p>	<p>√</p>